

PRA-7
**Virginia State Corporation Commission
eFiling CASE Document Cover Sheet**

21062023

Case Number (if already assigned) PUR-2021-00058

Case Name (if known) Application of Virginia Electric and Power Company,
For a 2021 triennial review of the rates, terms and
conditions for the provision of generation, distribution
and transmission services pursuant to § 56-585.1 A of
the Code of Virginia

Document Type EXTE

Document Description Summary Testimony and exhibits of Dr. J. Randall Woolridge, Mr.
D. Scott Norwood, and Mr. Ralph C. Smith, C.P.A. on
behalf of the Office of Attorney General, Division of
Consumer Counsel.

More than 100 pages per CLK-2020-00005

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Exhibit LA-5

**Earnings Test Results and Over Earnings Sharing – Illustrative
Materials from Staff’s Presentation in Docket No. PUE-2014-00026**

**(Patrick Carr’s Testimony, pages 22-25; Staff Witness Carr’s
Statements VIII, IX, X, and XI)**

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STATE CORPORATION
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Case No. PUE-2014-00026
Sponsor: STAFF
Exhibit No. 70

Witness: PATRICK W. CARR
Bailiff: SHERMAN MCLAUGHLIN, JR



1 use of this cash is a benefit to the Company and has been provided by customers.
2 Such cash flow differences are typically reflected in rate base (e.g., most
3 accumulated deferred federal income taxes are reflected in rate base). Staff
4 therefore proposes adjustments to include the ADVSIT balance as reductions to
5 rate base in the earnings tests and going-forward analysis.²⁴

6 **E. COST OF CAPITAL**

7 **Q21. PLEASE DISCUSS THE DIFFERENCE BETWEEN STAFF'S AND THE**
8 **COMPANY'S ADJUSTMENTS TO INTEREST EXPENSE, JOB**
9 **DEVELOPMENT CREDITS CAPITAL EXPENSE, AND COMMON**
10 **EQUITY CAPITAL.**

11 **A21.** The Company adjusted interest expense, Job Development Credits ("JDC"), and
12 common equity capital using its proposed capital structures. Staff witness
13 Maddox has proposed different end-of-period capital structures for use in the
14 earnings tests. Staff has adjusted interest expense, JDC, and common equity
15 capital using the capital structures supported by Staff witness Maddox.

16 **F. EARNINGS TEST RESULTS AND RECOMMENDATIONS**

17 **Q22. PLEASE DISCUSS THE RESULTS OF STAFF'S EARNINGS TESTS.**

²⁴ Staff's going-forward adjustment is discussed in more detail later in my testimony.

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1 **A22.** Based on Staff's analysis, APCo earned returns on its Virginia-jurisdictional
2 common equity of 11.80% and 13.96% in 2012 and 2013, respectively.²⁵ On a
3 combined basis, the Company earned a 12.85% ROE for the biennial review
4 period.²⁶ This return is more than 50 basis points above the fair combined ROE
5 of 10.9% applicable to the earnings tests.

6 **Q23. GIVEN THOSE RESULTS AND THE RELEVANT ROE BENCHMARKS,**
7 **WHAT ARE STAFF'S RECOMMENDATIONS AS A RESULT OF THE**
8 **EARNINGS TESTS?**

9 **A23.** As noted above, the Company earned more than 50 basis points above its fair
10 combined ROE. Staff therefore recommends that the Commission direct the
11 Company to refund 60% of its excess combined 2012 and 2013 earnings to
12 customers in accordance with § 56-585.1 A 8 of the Code.

13 The excess earnings for the biennial review period total \$26.1 million. On
14 a revenue requirement basis, this amounts to \$37.4 million.²⁷ Therefore, the
15 Company should be required to refund 22.5 million, or 60% of this amount, to its
16 customers. Staff witness Abbott addresses the appropriate class allocation of the
17 refund.

18 After this refund, and excluding the remaining 40% of excess earnings that
19 shareholders are permitted by the Code to retain, the Company will have earned
20 an 11.4% ROE – 50 basis points above its fair combined ROE in accordance with

²⁵ See Statements III to my testimony for 2012 and 2013.

²⁶ See Statement IX to my testimony.

²⁷ *Id.*



1 requirements of the Code. Based on advice of counsel, any earnings above the
2 bottom of the earnings collar, or 10.4%, can be used to accelerate recovery of
3 regulatory assets. Because the Code considers earnings within a utility's
4 authorized range neither excessive nor insufficient,²⁸ costs that do not reduce a
5 company's earnings below its authorized range should be considered recovered.
6 Therefore, Staff believes earnings within the approved ROE range of 10.4% to
7 11.4% should be used to accelerate the recovery of regulatory assets. Staff
8 recommends the Commission find that the Company's \$6,914,157 balance of
9 2013 vegetation management pilot costs,²⁹ \$17,166,943 balance of deferred 2009
10 storm damage costs, \$171,528 balance of deferred E&R surcharge costs, and
11 \$4,195,838 of the Company's unrecovered Other Post Employment Benefit
12 ("OPEB") transition obligation³⁰ have been recovered during the 2012-2013
13 biennial review period.³¹ Therefore, these amounts do not need to be recovered
14 again from customers in the future.

15 After Staff's recommended refund and accelerated recovery of regulatory
16 assets, the Company will have earned a 10.4% ROE plus the 40% of retained
17 excess earnings, or a 10.98% ROE in total. This is illustrated in Statements IX

²⁸ Va. Code § 56-585.1 A 2 g.

²⁹ These costs, and their proper accounting, are discussed by Staff witness Ellis.

³⁰ The OPEB transition obligation's recovery began January 1, 1993, and has a 40-year recovery period. The Company's total Virginia-jurisdictional unrecovered balance as of December 31, 2013, was \$15,852,405 and it would have a remaining balance of \$11,656,567 as of that date after the accelerated recovery recommended above.

³¹ These dollar amounts are on a Virginia-jurisdictional, pre-tax basis.

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1 and XI. This earned return is within the Company's 10.4% to 11.4% statutory
2 range, which the Code identifies as sufficient.

3 **Q24. PLEASE DISCUSS THE SPECIFIC EARNINGS TEST ISSUES THE**
4 **COMMISSION DIRECTED THE COMPANY AND STAFF TO ADDRESS**
5 **IN ITS VEGETATION MANAGEMENT PILOT ORDER IN CASE NO.**
6 **PUE-2012-00069.**³²

7 **A24.** The first issue is "where within the return on equity range (collar) identified in
8 § 56-585.1 A 2 g of the Code of Virginia is it appropriate for testing deferred
9 costs recovery."³³ Staff believes, as discussed above, that the floor of the collar is
10 the appropriate point for testing recovery of deferred vegetation management
11 costs and other regulatory assets.

12 The second issue is "whether the earnings test is based on the operating
13 results of the year the deferral was recorded or the results of the two combined
14 years of the biennial review."³⁴ Staff believes the results of the two combined
15 biennial review years is the appropriate period for the purpose of testing recovery
16 of deferred vegetation management costs and other regulatory assets. This is
17 consistent with the use of a two-year period's results under § 56-585.1 of the Code
18 when determining rate refunds and opportunities for rate increases and decreases.

³² *Application of Appalachian Power Company, For approval of a cycle-based vegetation management pilot program*, Case No. PUE-2012-00069, 2013 S.C.C Ann. Rept. 275, 277, Order on Application (Feb. 21, 2013).

³³ *Id.* at 6.

³⁴ *Id.*

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Exhibit No. _____
 Witness: Carr

Statement VIII-ET-2012 and 2013

Appalachian Power Company

Schedule of Earnings Test Revenue Excess - Combined 2012 and 2013

Line No.		2012 and 2013 Combined	2012	2013
1	Earned Return on Equity	12.85%	11.80%	13.96%
2	Earnings (Excess)	(\$26,121,118)	(\$3,729,260)	(\$22,391,858)
3	Revenue (Excess)	(\$37,439,066)	(\$3,926,686)	(\$33,512,380)
4	Statutory Refund Percentage	<u>60%</u>		
5	Refund	<u>(\$22,463,440)</u>		
6	Shareholder-Retained Excess	(\$14,975,626)		



Exhibit No. _____
 Witness: Carr
 Statement IX-ET-2012 and 2013

Appalachian Power Company
 Rate of Return Statement - Regulated Asset Recovery and Final Biennial Earnings

Generation and Distribution

2012 and 2013 Combined

Line No.	Description	Amounts After Refunds and Excluding Retained Excess Col. (1)	(Over)/Under Earnings Relative to 10.40% ROE Col. (2)	Amounts After Regulatory Asset Recovery Col. (3)	Company's Retained Excess Above 11.40% ROE Col. (4)	Final Amounts After Refunds and Reg. Asset Recovery Col. (5)
1	Operating Revenue	\$2,807,659,797	(\$27,764,312)	\$2,779,895,485	\$14,975,626	\$2,794,871,112
2	Total Operating Revenue	\$2,807,659,797	(\$27,764,312)	\$2,779,895,485	\$14,975,626	\$2,794,871,112
3	Operating Revenue Deductions	\$1,988,603,252	0	\$1,988,603,252	\$75,374	\$1,988,678,626
4	Operation and Maintenance Expense	297,802,996	0	297,802,996	0	297,802,996
5	Depreciation and Amortization Expense	130,347,622	(9,717,509)	120,630,113	3,754,702	124,384,815
6	Federal Income Taxes	9,134,434	0	9,134,434	584,705	9,729,139
7	State Income Taxes	61,088,591	0	61,088,591	101,325	61,189,916
8	Taxes Other than Income	93,877	0	93,877	0	93,877
9	Total Operating Revenue Deductions	\$2,487,070,773	(\$9,717,509)	\$2,477,353,264	\$4,526,106	\$2,481,879,370
10	Operating Income (Loss)	\$320,589,024	(\$18,046,803)	\$302,542,222	\$10,449,520	\$312,991,742
11	Plus: AFUDC	\$0	\$0	\$0	\$0	\$0
12	Less: Charitable Donations Net-Of-Tax	399,403	0	399,403	0	399,403
13	Less: Interest on Customer Deposits	90,715	0	90,715	0	90,715
14	Less: Other Interest	0	0	0	0	0
15	Adjusted Operating Income	\$320,098,906	(\$18,046,803)	\$302,052,104	\$10,449,520	\$312,501,624
16	Plus: Other Income	\$0	\$0	\$0	\$0	\$0
17	Less: Interest Expense	114,353,479	0	114,353,479	0	114,353,479
18	Less: Preferred Dividend	0	0	0	0	0
19	Less: JDC Capital Expense	11,894	0	11,894	0	11,894
20	Income Available for Common Equity	\$205,733,533	(\$18,046,803)	\$187,686,731	\$10,449,520	\$198,136,251
21	Rate Base					
22	Allowance for Working Capital	\$30,613,650	\$0	\$30,613,650	\$0	\$30,613,650
23	Net Utility Plant	5,249,776,696	0	5,249,776,696	0	5,249,776,696
24	Other Rate Base Deductions	1,140,559,316	0	1,140,559,316	0	1,140,559,316
24	Total Rate Base	\$4,139,831,030	\$0	\$4,139,831,030	\$0	\$4,139,831,030
25	Total Capital	\$4,139,831,030	\$0	\$4,139,831,030	\$0	\$4,139,831,030
26	Common Equity Capital	\$1,804,680,104	\$0	\$1,804,680,104	\$0	\$1,804,680,104
27	Rate of Return Earned on Rate Base	7.73%		7.30%		7.55%
28	Rate of Return Earned on Common Equity	11.40%		10.40%		10.98%
29	Benchmark Rate of Return on Common Equity	11.40%		10.40%		10.98%

Exhibit No. _____
 Witness: Carr
 Statement X-ET-2012 and 2013

Appalachian Power Company
 Reconciliation of Company and Staff Returns on Equity - Combined 2012 and 2013

Generation and Distribution

Line No.	Description	2012 and 2013 Combined		ROE Impact
		Revenue Basis Impact	Earnings Impact	
1	ROE Per Company's Application			10.80
2	35-Day Coal Inventory	11,576,148	7,429,957	0.41
3	Property Tax Functionalization and Jurisdictionalization	10,294,788	6,556,029	0.36
4	Capital Structure and Cost of Debt	9,424,312	5,948,622	0.33
5	Vegetation Management Pilot Deferral	6,824,029	4,207,318	0.23
6	Incentive Compensation	5,019,865	3,163,380	0.18
7	Cumulative ARO	4,053,094	2,601,467	0.14
8	Deferred Virginia SIT Rate Base Reduction	3,611,094	2,269,578	0.13
9	Payroll Factor Functionalization	3,031,865	1,622,958	0.09
10	Amos Unit 3 Removed from 2013 13-Month Average	2,063,613	1,327,673	0.07
11	Putnam Coal Terminal	1,466,119	940,853	0.05
12	Cash Working Capital	753,366	464,830	0.03
13	Corporate Aviation	914,271	577,095	0.03
14	Charitable Contributions	405,385	256,012	0.01
15	Other and Rounding			(0.02)
16	ROE Per Staff Statement VIII			12.85



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Exhibit No. _____
 Witness: Carr
 Statement XI-ET-2012 and 2013

Appalachian Power Company
 Case No. PUE-2014-00026

Illustration of Staff's Recommendations for 2012-2013 Combined Earnings Test Returns

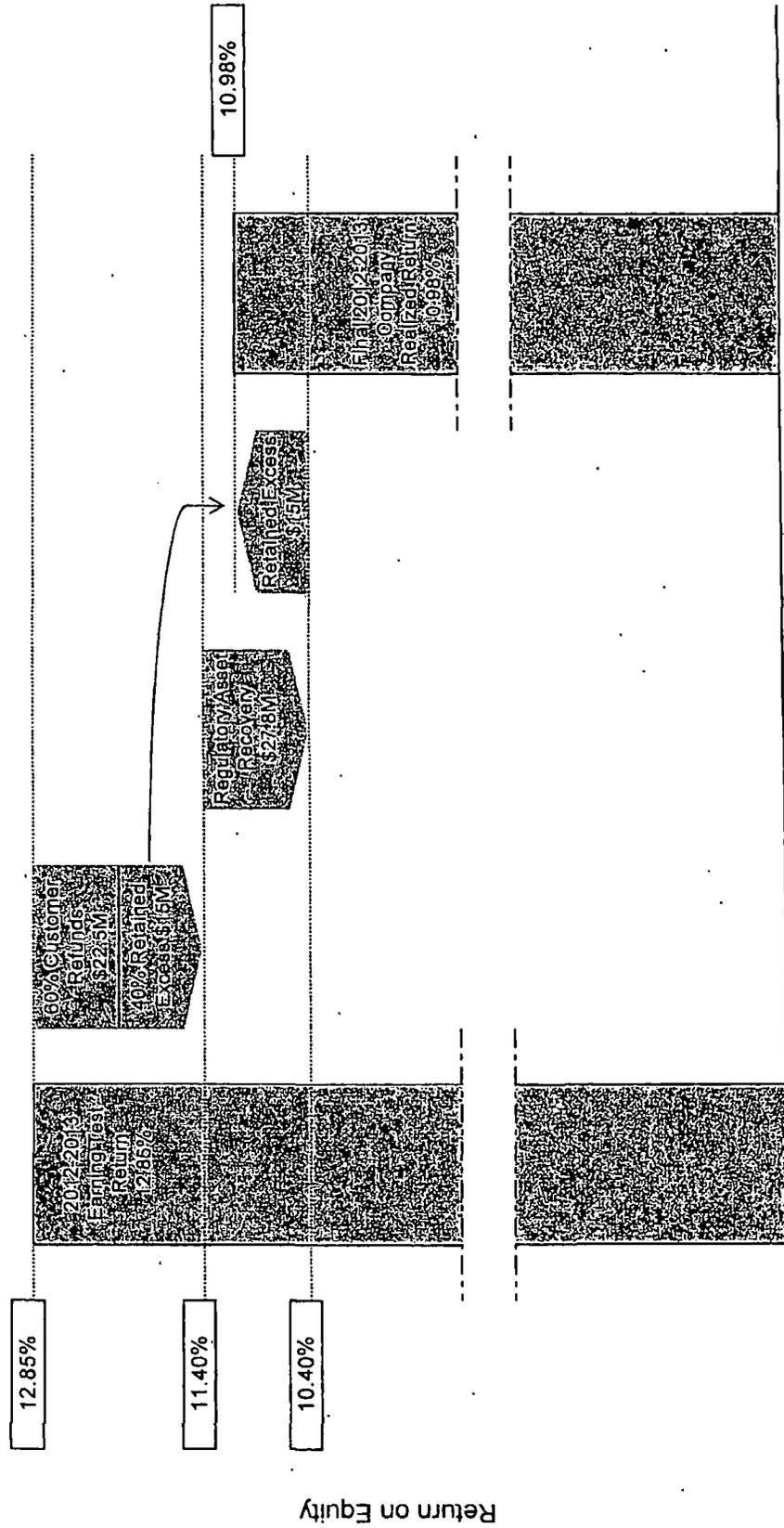


Exhibit LA-6
Company Discovery Responses Regarding Lobbying Expense
(Responses to Staff -3-077; Staff 17-360 Corrected; and Staff 119-383)

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Third Set

The following response to Question No. 77 of the Third Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on April 26, 2021 has been prepared under my supervision.

Carolyn Morrison
Manager, PAC & Grassroots
Dominion Energy Services, Inc.

Question No. 77

Please provide a detail of all lobbying costs incurred during the test period 2017-2020 and budgeted for the rate year 2022.

- (a) Additionally, please provide a copy of any policy, procedure manual, memo, or other relevant guidance used internally regarding the classification of an expense as lobbying.

Response:

See Attachment Staff Set 3-77 (CHM) for the Company's policy on classification of an expense as lobbying.

VIRGINIA**EXPENSE CHARGING GUIDELINES****EXPENSES PERTAINING TO PUBLIC OFFICIALS****PROHIBITED**

- A single gift, or an aggregate of gifts, over \$100 per year per recipient unless an exception applies

THE FOLLOWING TYPES OF EXPENSES

- Anything of value, nominal or otherwise including, but not limited to:
 - Meals, transportation, lodging
 - Tickets
 - Souvenirs

TO THE FOLLOWING TYPES OF INDIVIDUALS

- Executive: (i) Governor, (ii) Lt. Governor, (iii) Attorney General, Secretaries, Dep. Secretaries, agency heads, members of supervisory or policy boards, staff of (i), (ii) or (iii)
- Legislative: members and members-elect of General Assembly, member of any committee or entity established by or responsible to General Assembly, staff of any of these
- Candidates for state or local offices
- Others: certain local and state officials and employees, immediate family of any persons in above categories

***MUST BE DISCLOSED TO REPORTER IN CORPORATE AFFAIRS: CAROLYN MORRISON
(CAROLYN.H.MORRISON@DOMINIONENERGY.COM)***

HOW TO REPORT**REGISTERED LOBBYISTS**

- No later than the 5th of each month, electronic report must be submitted to reporter
- Monthly report must be certified by registered lobbyist
- If no expense incurred, monthly report indicating such is required

ANYONE NOT REGISTERED TO LOBBY

- Notice must be given to reporter prior to incurring expense or offering gift
- Guidelines will be provided with instructions for reporting
- If expense/gift is within limits of the law and Dominion Energy policy, final report due to reporter within 10 days of gift or expense

VIRGINIA**CHARGE TIME TO WBS ENDING IN LOBBYVA IF ...****YOU ARE (THROUGH WRITTEN OR ORAL COMMUNICATION) ...**

- Influencing or attempting to influence executive or legislative action, nomination or appointments (by the General Assembly), executive orders or procurement transactions where the stated or expected value is \$5 million or more
- Soliciting others to influence an executive or legislative official (including grassroots efforts)
- Preparing talking points and materials related to a legislative or executive action, intended as a handout given to a legislative or executive official

DIRECTED TO ONE OF THE FOLLOWING TYPES OF INDIVIDUALS

- Executive: (i) Governor, (ii) Lt. Governor, (iii) Attorney General, Secretaries, Dep. Secretaries, agency heads, members of supervisory or policy boards, staff of (i), (ii) or (iii)
- Legislative: members and members-elect of the General Assembly, member of any committee or entity established by and responsible to the General Assembly; or either house; staff of any of these

INDIVIDUALS NOT REGISTERED TO LOBBY SHOULD ENTER TIME ACCORDING TO THE GUIDELINES ABOVE WHEN CONDUCTING LOBBYING ACTIVITIES.

EXAMPLES OF ACTIVITIES NOT CONSIDERED STATE LOBBYING**INFORMATIONAL MEETINGS**

- Attendance at meeting as subject matter expert provided job duties do not regularly include lobbying
- Example: tour of operating facility or facility under construction, no support requested

ACTIVITIES LIMITED TO TESTIMONY OR PUBLIC MEETINGS

- Information compelled by action of legislative or executive body

ACTIVITIES RELATED TO PROJECTS WHERE STATE APPROVAL IS NOT REQUIRED

- Includes meetings with Mayors, City Councils, Board of Supervisors, other local officials
- Example: meeting with fire marshal about code requirements
- Example: projects requiring FERC (federal), but not state, approval

OTHER

- Time preparing with meetings for covered officials, including the development of talking points and materials (and the documents are not distributed externally)
- Tracking legislation
- Attendance at committee meetings for monitoring purposes
- Time spent at the General Assembly, but not directly advocating to an executive or legislative official on a matter involving executive or legislative action
- Written communication as a constituent
- Conversations with officials covered above, but not pertaining to business or requesting action on their part

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Third Set

The following **corrected** response to Question No. 77 of the Third Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on April 26, 2021 has been prepared under my supervision.

Nancy D. Fines
Manager – DES Accounting
Dominion Energy Services, Inc.

Question No. 77

Please provide a detail of all lobbying costs incurred during the test period 2017-2020 and budgeted for the rate year 2022.

Original Response:

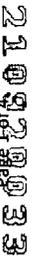
See Attachment Staff Set 3-77(NF) for a detail of costs recorded in FERC Account 426.4, *Expenditures for certain civic, political and related activities*, including lobbying costs, during the test period 2017-2020. None of these costs are included in the cost of service or requested for recovery from customers.

The Company identified approximately \$5 million of additional expenses that should have been removed from the cost of service. These costs are reflected in the attached and the Company plans to propose an adjustment to the cost of service to reflect this new exclusion.

The Company does not request recovery of such costs from customers and does not budget for these costs to be recovered from customers in the future, therefore there is no budgeted level for the rate year 2022.

Corrected Response (August 4, 2021):

In researching Staff Set 16-346, Staff Set 17-366, and Staff Set 17-367, the Company has found certain costs need to be reclassified. Please see Corrected Attachment Staff Set 3-77 (NDF).



Virginia Electric and Power Company
 Case No. PUR-2021-00058
 Staff Set 3-77 Attachment

NOTE: All costs listed below are to be excluded from cost of service so no customers pay them

Vendor	Total	2017	2018	2019	2020
Consulting & Lobbying removed from cost of service	4,321,180	902,917	964,995	760,778	1,692,489
AUBREY TARKINGTON	34,933				34,933
COMMONWEALTH CONNECTIONS INC	54,381	15,688	31,596	7,097	
EVA T HARDY	22,500	3,000		7,000	12,500
IRON OX CONSULTING INC	264,944	71,046	64,191	61,659	68,048
JACKSON WEST CONSULTING LLP	79,849			23,525	56,324
JOHN WATKINS	92,297				92,297
JUNIUS WILLIAMS	7,555			7,555	
MCGUIREWOODS CONSULTING LLC	486,795	174,801	57,451	231,893	22,649
MCGUIREWOODS LLP	551,555		38,033	22,880	490,643
REED SMITH LLP	859,417	88,986	81,370	108,159	580,902
ROBERT C ORNDORFF	9,254				9,254
TWO CAPITOLS CONSULTING LLC	309,930	67,946	98,728	89,340	53,916
SALARY COST	1,547,772	481,450	593,626	201,671	271,025
Political and other similar organizations removed from cost of service	1,589,094	152,760	148,543	880,353	407,437
AMERICAN WORKING FAMILIES ACTION	7,718				7,718
ATTORNEY GENERAL STRATEGIES LLC	85,337			41,391	43,946
CLT HOST 2020 INC	118,575			118,575	
COMERICA BANK	13,602		9,096		4,506
DEMOCRATIC ATTORNEYS GENERAL ASSN	13,308	7,520			5,789
DEMOCRATIC GOVERNORS ASSN	193,719	31,981	25,250	77,074	59,414
DEMOCRATIC LEGISLATIVE CAMPAIGN	253,211			202,763	50,448
EMERGE VIRGINIA	23,715				23,715
GOOD LAND COMMITTEE THE INC	47,430			47,430	
LARRY SABATO	20,542	11,092		9,450	
MOVING NC FORWARD INC	29,980	5,612	5,110	9,582	9,676
NATIONAL CONFERENCE OF STATE	5,083	3,760		-1,571	2,894
NATIONAL GOVERNORS ASSN	42,845			19,130	23,715
NATIONAL GOVERNORS ASSN CENTER FOR	45,678			7,088	38,590
NC INAUGURAL BALL	24,860	24,860			
QUORUM ANALYTICS INC	37,639				37,639
REPUBLICAN ATTORNEYS GENERAL ASSN	12,343	7,520			4,824
REPUBLICAN GOVERNORS ASSN	175,743	33,636	65,913	45,679	30,515
REPUBLICAN LEADERSHIP	18,900		18,900		
REPUBLICAN STATE LEADERSHIP	394,721	16,836	24,274	296,676	56,935
RICHMOND INAUGURATION	9,944	9,944			
WESTERN GOVERNORS ASSN	14,202			7,088	7,115

Dues, Memberships & other items removed from cost of service	1,546,070	411,993	407,170	382,530	344,377
AMERICAN COUNCIL ON RENEWABLE	22,470			11,858	10,612
CHAMBER OF COMMERCE	304,498	108,267	109,705	42,651	43,876
CLEAN AFFORDABLE RELIABLE	1,675	1,675			
COUNCIL ON STATE TAXATION	1,396	1,396			
EDISON ELECTRIC INSTITUTE	885,527	229,919	211,082	222,166	222,361
ENERGY EQUIPMENT & INFRASTRUCTURE	11,279		1,431	5,274	4,574
HOME BUILDERS ASSN OF	1,165		1,165		
INDEPENDENT POWER PRODUCER	732		732		
LOUDOUN COUNTY OF	7,589		7,589		
NATIONAL ASSN OF MANUFACTURERS	49,743	14,175	15,915	8,667	10,986
NATIONAL HYDROPOWER	11,169		5,462		5,707
NORTH AMERICAN ELECTRIC RELIABILITY CORP	17,695	3,946	4,603	4,428	4,718
NORTH CAROLINA CHAMBER	12,734			9,094	3,640
NORTHERN VIRGINIA TECHNOLOGY	2,971	2,971			
NUCLEAR ENERGY INSTITUTE	190,062	49,645	38,189	77,716	24,513
USWAG	3,120		676	677	1,767
VA COAL & ENERGY ALLIANCE	250		250		
VIRGINIA MANUFACTURERS ASSN	19,057		9,413		9,644
VIRGINIA OIL & GAS ASSN	2,937		957		1,980

Market Research, Marketing & Advertising removed from cost of service	7,208,977	534,741	3,144,443	3,345,781	184,012
ACORN SIGN GRAPHICS	185			185	
ALL AMERICAN PUBLICATIONS LLC	561		377	184	
ALLIANCE FOR THE CHESAPEAKE BAY	5,546				
CAPITAL REGION AIRPORT COMMISSION	14,053		14,053		
CRA COMMUNICATIONS LLC	164,599	25,418	29,461	100,453	9,267
DULLES REGIONAL COFO	3,781		3,781		
FAUQUIER COUNTY OF	1,493	1,493			
JAMES A BACON	24,335	19,210	5,125		
PUBLIC OPINION STRATEGIES LLC	958,664	342,882	365,611	166,022	84,150
RADIO ADVERTISING	43,635		11,978	11,858	19,800
RICHMOND PARADE INC	4,474	1,493		2,981	
ROBERTSON MARKETING GROUP INC	94,440	64,862	29,293	181	103
RPAC INC	298,470		298,470		
SKDK, LLC	5,289,844		2,302,991	2,986,853	
SUN INC	23,750		352		23,398
SUPERIOR DOCUMENT SERVICES	6,307	6,307			
TOTAL PRINTING CO INC	70,836	33,503	27,784	7,919	1,629
TWO EIGHTY EIGHTY SPORTS GROUP LLC	135,952	8,169	42,483	53,057	32,243
VIRGINIA ASSOCIATION OF COUNTIES	5,966	5,966			
VIRGINIA CAPITOL CONNECTIONS INC	567		567		
VIRGINIA INTERACTIVE	1,472	471	407		594
VIRGINIA MUNICIPAL LEAGUE	6,464	6,464			
VIRGINIA PUBLIC ACCESS PROJECT INC	27,305	6,899	6,313	1,779	12,315
WOMEN'S SUMMITT	2,983	2,983			
WORTH HIGGINS & ASSOCIATES INC	23,297	3,075	5,399	14,311	512

Consultants removed from cost of service	2,900,608	411,796	847,176	884,929	756,707
AUGUST WALLMEYER COMMUNICATIONS LTD	103,925			28,062	75,863
C THREE GROUP LLC THE	8,274	3,377	2,338	1,518	1,042
COALFIELD STRATEGIES LLC	66,666				66,666
CORNERSTONE GOVERNMENT AFFAIRS INC	14,387			7,230	7,157
D SQUARED TAX STRATEGIES LLC	171,190	47,122	43,056	41,526	39,486
DLC STRATEGIES LLC	34,878	28,317	6,560		
EIGE	6,640	6,640			
ERIC ANDERSON	20,790		18,191	2,599	
GEORGE JAMERSON JR	13,771			13,771	
GORDON C MORSE	263,644	69,679	64,903	63,798	65,265
HEATHER DERFLINGER	2,835				2,835
INDIAN LANE LLC	201,387	23,283	62,673	66,468	48,962
JIM HUNTER LLC	91,640	2,598	36,586	18,653	33,804
JOHNSON INC	448,501	80,353	208,689	125,886	33,573
KILBERG CONSULTING	3,117		3,117		
LAUREL STRATEGIES INC	319,363	59,335	62,725	179,959	17,344
LEGRAND INC	295,422	27,756	98,610	81,773	87,283
LEIGHTY & ASSOCIATES LLC	51,002		11,411	26,539	13,052
MCDOWELL JEWETT COMMUNICATIONS LLC	110,880		35,880	75,000	
NATALIE MOORE	2,846				2,846
RESOLUTE STRATEGIES GROUP LLC	29,079				29,079
RIVER CITY STRATEGIES LLC	113,653	7,575	23,743	27,908	54,427
ROBERT G BURNLEY LLC	256,471	44,052	82,301	34,295	95,822
SAGAC PUBLIC AFFAIRS LLC	3,569		3,569		
TRENT CONSULTANT LLC	33,054			33,054	
TROUTMAN PEPPER HAMILTON	36,664				36,664
WILKINSON BARKER KNAUER LLP	21,315				21,315
WILKINSON SPORTS ADVISORY LLC	105,648	11,708	12,825	56,892	24,222
WILLIAM MULLENS	70,000		70,000		
Mistakenly charged, removed from cost of service	357,601	181,130	32,549	81,491	62,431
BLUEPRINT STRATEGY LLC	5,705		2,870	2,835	
BROWN RUDNICK	26,902	26,902			
CEA	82,654	45,790	7,796	29,068	
CENTER FORWARD	21,225				21,225
GROW CAPITAL JOBS FOUNDATION	49,765	49,765			
MARCELLUS SHALE COALITION	82,779	36,915		23,400	22,465
MARYLAND DEMCRATIC PARTY	10,583	5,533	5,050		
MARYLAND GOVERNOR SPONSORSHIP	11,813			11,813	
PENNSYLVANIA CHAMBER OF BUSINESS &	32,959	9,641	7,440	6,623	9,255
SOUTHERN MARYLAND MINORITY CHAMBER	5,797	2,767	3,030		
WEST VIRGINIA INAUGURAL GOP	2,500				2,500
WEST VIRGINIA MANUFACTURERS ASSN	21,135	3,817	6,363	3,968	6,987
WEST VIRGINIA OIL & NATURAL GAS	3,785			3,785	

Civic, Consultant and Other removed from cost of service	793,541	227,928	64,666	-42,889	543,836
Grand Total	18,717,071	2,823,265	5,609,544	6,292,972	3,991,290
Additional Virginia Manufacturer's Association	18,827	9,413	0	0	9,413
Additional Edison Electric Institute	72,793	0	0	0	72,793
Other Reclasses	-920	-439	6,516	-6,997	0
Grand Total - Corrected	18,807,771	2,832,239	5,616,060	6,285,975	4,073,496

Notes:
 Staff Set 16-346
 Staff Set 17-366
 Staff Set 17-367

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Seventeenth Set

The following **corrected** response to Question No. 360 of the Seventeenth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on June 29, 2021 has been prepared under my supervision.

Nancy D. Fines
 Manager - Accounting
 Dominion Energy Services, Inc.

Question No. 360

Please refer to the Company's attachment response to Staff Set 3-77. Please provide the total annual amounts by FERC account for each of the four years of the test period.

Original Response:

\$13,420,310 is recorded in FERC Account 426.4. As indicated in the Company's response to Staff Set 3-77, the Company identified an approximate \$5 million of additional expenses (\$5,296,761) that the Company plans to propose to exclude with a regulatory accounting adjustment.

	Total	2017	2018	2019	2020
Total in Set 3-77	18,717,071	2,823,265	5,609,544	6,292,972	3,991,290
Recorded in 426.4	13,420,310	1,474,315	4,047,356	4,845,765	3,052,874
Ratemaking Adjustment	5,296,761	1,348,949	1,562,188	1,447,207	938,416

Corrected Response (August 4, 2021):

\$13,420,310 is recorded in FERC Account 426.4, the additional \$5,387,461 will be excluded with a regulatory accounting adjustment. See the table below for the breakdown by year.

	Total	2017	2018	2019	2020
Attachment Staff Set 3-77 Corrected	18,807,771	2,832,239	5,616,060	6,285,975	4,073,496
Recorded in FERC Account 426.4	13,420,310	1,474,315	4,047,356	4,845,765	3,052,874
Regulatory Accounting Adjustment	5,387,461	1,357,924	1,568,704	1,440,210	1,020,622

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Nineteenth Set

The following response to Question No. 383 of the Nineteenth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 7, 2021 has been prepared under my supervision.

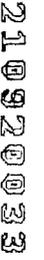
Janet L. Mitchell
Regulatory Specialist
Dominion Energy Services, Inc.

Question No. 383

Please refer to the Company's response to Staff Interrogatory No. 17-360 and provide the proposed regulatory accounting adjustment for the \$5,296,761 of additional lobbying expense.

Response:

See Attachment Staff Set 19-383 (JLM) for the requested information.



	2017	2018	2019	2020
Total	1,357,924	1,568,704	1,440,210	1,020,622
Regulatory Accounting Adjustment (Staff Set 17-360 Corrected)				
Total Plant Allocation Factor	78.5683%	78.4100%	78.7634%	79.5048%
VA Jurisdictional Adjustment	(1,066,898)	(1,230,021)	(1,134,358)	(811,443)
Generation Factor	51.4042%	50.5450%	50.8769%	50.2103%
Distribution Factor	31.3003%	31.6519%	30.6506%	30.8774%
Generation Adjustment	(548,430)	(621,714)	(577,127)	(407,428)
Distribution Adjustment	(333,942)	(389,325)	(347,687)	(250,553)
Total G&D Adjustment	(882,372)	(1,011,040)	(924,814)	(657,981)

Regulatory Accounting Adjustment (Staff Set 17-360 Corrected)

Total Plant Allocation Factor

VA Jurisdictional Adjustment

Generation Factor

Distribution Factor

Generation Adjustment

Distribution Adjustment

Total G&D Adjustment

Exhibit LA-7
Company Discovery Responses Regarding Impairments Related to Plant
Retirements
(Response to Staff 4-103)

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Fourth Set

The following response to Question No. 103 of the Fourth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on May 3, 2021 has been prepared under my supervision.

David Williams
Supervisor – Fixed Assets Accounting
Dominion Energy Services, Inc.

Question No. 103:

Refer to Schedule 48a. Please explain how the Company determined the net book value of each generating unit written off during the Triennial Period. Provide any calculations or supporting documents used to assign accumulated depreciation balances to each generating unit.

Response:

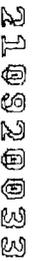
Fixed Asset Accounting utilizes the most recent month-end NBV report in Power Plan to determine the net book value of each generating unit. This report provides the total cost of all assets at a generating unit and the corresponding accumulated depreciation associated with each asset. The calculations in the Schedule 48a report utilized the totals provided from these reports for their calculations.

See Attachment Staff Set 4-103 (a) (DW) and Attachment Staff Set 4-103 (b) (DW) for support for the generating units written off.

Attachment Staff Set 4-103(a)
NBV Final Total
Amounts to write off 2019

	Cost Center	PIS	Acc Dep	Net	CWIP	Total
POSS 3	103630	43,954,814.48	41,638,850.17	2,315,964.31	778,967.56	3,094,931.87
POSS 4	103631	66,242,768.59	55,337,199.16	10,905,569.43	749,158.64	11,654,728.07
POSS 5	103641	240,356,327.84	170,075,819.40	70,280,508.44	218,512.26	70,499,020.70
Bremo 3	103632	38,158,460.84	22,983,323.05	15,175,137.79	-	15,175,137.79
Bremo 4	103633	58,125,275.76	33,432,086.72	24,693,189.04	-	24,693,189.04
Chesterfield 3	103634	26,166,286.38	25,920,434.42	245,851.96	-	245,851.96
Chesterfield 4	103635	30,549,372.29	22,285,882.35	8,263,489.94	-	8,263,489.94
Meck 1	103212	17,709,945.17	5,211,587.28	12,498,357.89	-	12,498,357.89
Meck 2	103212	17,337,042.58	5,214,176.30	12,122,866.28	-	12,122,866.28
Bell 1	103387	54,241,370.55	14,682,806.25	39,558,564.30	-	39,558,564.30
Bell 2	103387	18,049,838.12	3,566,784.30	14,483,053.82	-	14,483,053.82
Pitt 1	103220	33,507,112.72	11,608,025.25	21,899,087.47	-	21,899,087.47
Unit Specific Write-Off		644,398,615.32	411,956,974.65	232,441,640.67	1,746,638.46	234,188,279.13
Common						
		PIS	Acc Dep	Net	CWIP	Total
Pitt Common	103220	19,577,745.67	2,828,658.63	16,749,087.04	-	16,749,087.04
Chesterfield Common	100111	6,531,492.33	5,952,840.07	578,652.26	41,900.20	620,552.46
Possum Point Common	100317	37,282,352.94	10,136,538.29	27,145,814.65	10,149,993.78	37,295,808.43
Meck Common	103212	11,064,366.95	2,603,261.72	8,461,105.23	-	8,461,105.23
Bremo Common	100324	40,998,653.45	21,676,167.34	19,322,486.11	-	19,322,486.11
Bell Common	103387	8,832,013.69	2,045,233.81	6,786,779.88	2,590,763.49	9,377,543.37
Total Common Write-Off		124,286,625.03	45,242,699.85	79,043,925.18	12,782,657.47	91,826,582.65
Assets to be kept						
Chesterfield Unit 3	103634	40,739,808.06	28,519,546.50	12,220,261.56	-	12,220,261.56
Chesterfield Unit 4	103635	60,996,717.34	32,637,912.72	28,358,804.62	-	28,358,804.62
Possum Point Unit 3		2,395,950.96	1,851,735.57	544,215.39	-	544,215.39
Possum Point Unit 5		5,274,291.55	2,197,025.85	3,077,265.70	-	3,077,265.70
	103641			-	-	-
Total Assets Kept		109,406,767.91	65,206,220.64	44,200,547.27	-	44,200,547.27
Land						
Bremo	100324	444,108.52	-	444,108.52	-	444,108.52
Mecklenburg	103212	358,386.00	-	358,386.00	-	358,386.00
Pittsylvania	103220	3,628,088.00	-	3,628,088.00	-	3,628,088.00
		4,430,582.52	-	4,430,582.52	-	4,430,582.52
316b Write-off						
Mecklenburg	103212	-	-	-	29,561.46	29,561.46
Pittsylvania	103220	-	-	-	30,612.95	30,612.95
Bremo	100324	-	-	-	433,339.30	433,339.30
Possum	103641	-	-	-	863,193.55	863,193.55
Total		-	-	-	1,356,707.26	1,356,707.26
Inventory						
Possum	103630				345,282.00	345,282.00
Possum	103631				345,282.00	345,282.00
Mecklenburg	103212				3,372,947.00	3,372,947.00
Pittsylvania	103220				4,764,036.00	4,764,036.00
Bremo	100324				2,479,714.00	2,479,714.00
Bellemeade	103387				2,670,900.00	2,670,900.00
Chesterfield	100111				6,911,917.00	6,911,917.00
Inventory write-off					20,890,078.00	20,890,078.00
ARC Assets						
Mecklenburg	103212					
Bremo	100324					
Bellemeade	103387					
Total to write off		764,254,657.83	457,199,674.51	307,054,983.32	36,776,081.19	343,831,064.51

Ties w/o/a to 2019 Impair workbook totals per Schedule 48a



Attachment Staff Set 4-103(b)
NBV Final Total
As of February 29, 2020

Chesterfield	687,099,642.28	
Yorktown	92,688,736.39	
ARC	<u>3,829,345.00</u>	
Total	<u>783,617,723.68</u>	Ties w/o/e to 2020 Impair workbook totals per Schedule 48a

Net Book Value of Chesterfield as of February 29, 2020

Unit	Plant In Service	Accum Depreciation	Net	Retain Plant	CWIP	Retain CWIP	Total
Chesterfield Write-off Summary							
5 and 6 - Coal	987,148,121.05	513,426,465.91	473,721,655.14	5,395,214.99	7,200,527.23	2,404,767.48	473,122,199.91
Remaining Unit 3 and 4 - Coal	101,333,137.57	53,542,517.88	47,790,619.69	45,737.48	-	-	47,744,882.21
Common assets	348,458,207.35	148,897,569.04	199,560,638.31	37,795,495.49	12,017,346.62	7,549,929.27	166,232,560.17
							<u>687,099,642.28</u>

Net Book Value of Plant as of February 29, 2020

Site/Unit	Plant In Service	Accum Depreciation	Net	CWIP	Total
Yorktown					
Unit 3	234,539,073.72	173,150,454.99	61,388,618.73	622,442.69	62,011,061.42
Transformer to keep	1,510,240.30	247,124.14	1,263,116.16		1,263,116.16
Unit 3 write off					60,747,945.26
Common	152,165,578.26	89,003,659.58	63,161,918.68	201,351.41	63,363,270.09
York Common assets previously abandoned	60,810,435.88	33,200,378.12	27,610,057.76	-	27,610,057.76
Common Remaining	91,355,142.38	55,803,281.46	35,551,860.92	201,351.41	35,753,212.33
ARO	2,369,907.05	1,393,381.85	976,525.20		976,525.20
Land	2,835,896.00		2,835,896.00		2,579,210.30
Common Less land & ARO	86,149,339.33	54,409,899.61	31,739,439.72	201,351.41	31,940,791.13
Previously written off					
Unit 1	63,718,162.22	52,837,372.94	10,880,789.28		10,880,789.28
Unit 2	107,441,812.18	77,809,661.33	29,632,150.85		29,632,150.85
Total					
	319,178,172.75	227,313,230.46	91,864,942.29		68,122,997.89

Entry

Loss (5399055)	
Acc Dep	227,313,230.46
Plant	319,178,172.75
CWIP	823,794.10
	320,001,966.85

21092003

ARC Gross Values	Gross	Acc Dep	NBV
Chesterfield	4,380,210.00	2,618,340.00	1,761,870.00
Yorktown	2,369,907.00	302,432.00	2,067,475.00
			<u>3,829,345.00</u>

Exhibit LA-8
Company Discovery Responses Regarding ADIT Related to Plant
Retirements
(Responses to OAG 13-264 and OAG 13-265)

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Thirteenth Set

The following response to Question No. 264 of the Thirteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 2, 2021 has been prepared under my supervision.

Daniela H. Lee
Tax Advisor
Dominion Energy Services, Inc.

Paul M. McLeod
Manager – Regulation
Dominion Energy Services, Inc.

As it pertains to legal matters, the following response to Question No. 264 of the Thirteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 2, 2021 has been prepared under my supervision.

Jimmie Zhang
McGuireWoods LLP

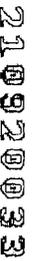
Question No. 264

Impairments Related to Early Retirements. Refer to the response to Staff 2-54. As it relates to the March 31, 2019 journal entries related to the generating unit impairments for 2019 which totaled \$343,831,065 (\$304,054,983 – Depreciation Expense + \$36,776,081 – CWIP Inventory/Supplies), please provide the following information:

- a. What was the ADIT impact of the Company's 2019 generating units impairment in the 2019 earnings test rate base and how was this amount derived? Show detailed calculations.
- b. Pursuant to part "a", how was the ADIT related to the 2019 generating units impairment recorded in the 2019 earnings test? Show the total Company and Virginia jurisdictional ADIT amounts.

Response:

- a. See Attachment AG Set 13-264 (DHL)(PMM).
- b. The Company objects to this request because it requires original work. Notwithstanding and subject to this objection, the Company provides the following response:



See Filing Schedule 40(a) for the allocation factors applicable to each item identified in the Company's response to subpart (a) of this response.

a.

	EOP	13 Month Average	Sch 23	Gross FED
Total 3/31/2020 Book Impairment	783,617,724.12			
	<u>783,617,724.12</u>			
Sch M - Addback/(Deduction)	783,617,724.12			
Fed Rate	0.21000			
Federal Benefit of State(FBOS)	(0.01230)			
State Rate				
NC	0.00122			
VA	0.05603			
WV	0.00130			
Total Tax Rate	<u>0.25625</u>			
Gross Fed ADIT	164,559,722	126,584,402 *		
FBOS ADIT	(9,635,050)	(7,411,577) *		
State ADIT				
NC	957,796	736,766 *		
VA	43,905,098	33,773,152 *		
WV	1,018,296	783,304 *		
Total ADIT - Asset/(Liab)	<u>200,805,862</u>	<u>154,466,048</u>		

* Gross Fed, FBOS and each State ADIT are reported in lines shown in the screenshots on the right.

VIRGINIA ELECTRIC AND POWER COMPANY							SCHEDULE 23
AVERAGE AND EXCESS STUDY - AVERAGED CHOICE IN AND CHOICE REMOVED							
13 MONTH AVERAGE - 2020							
SCHEDULE 23 - COST FREE CAPITAL							
System	Va Juris	Va Non-Juris	FERC	N.C. Juris	Ringfenced Projects	Allocation Basis	
227 HT:(REG ASSET - PLANT ABANDONMENT)	141,128,900	116,086,941	15,748,670	2,315,848	6,377,040	0 FACTORI	

VIRGINIA ELECTRIC AND POWER COMPANY							SCHEDULE 23
AVERAGE AND EXCESS STUDY - AVERAGED CHOICE IN AND CHOICE REMOVED							
13 MONTH AVERAGE - 2020							
SCHEDULE 23 - COST FREE CAPITAL							
System	Va Juris	Va Non-Juris	FERC	N.C. Juris	Ringfenced Projects	Allocation Basis	
231 KG:(DIT OPERATING)	5,229,030	4,370,654	565,963	54,656	237,747	0 DSIT_OPERATING	

VIRGINIA ELECTRIC AND POWER COMPANY							SCHEDULE 23
AVERAGE AND EXCESS STUDY - AVERAGED CHOICE IN AND CHOICE REMOVED							
13 MONTH AVERAGE - 2020							
SCHEDULE 23 - COST FREE CAPITAL							
System	Va Juris	Va Non-Juris	FERC	N.C. Juris	Ringfenced Projects	Allocation Basis	
284 JZ:(OTHER DEFERRED STATE TAXES)	0	0	0	0	0	0	
286 KA:(DSIT OPERATING - DC)	(59,807)	0	(2,908)	(516,869)	0	RATE_REV_N_CAROLINA	
286 KB:(DSIT OPERATING - NORTH CAROLINA)	(23,027,659)	(20,856,950)	(244,563)	0	0	RATE_REV_VIRGINIA	
287 KC:(DSIT OPERATING - VIRGINIA)	(552,638)	(464,679)	(8,053)	(27,321)	0	FACTOR1	
288 KD:(DSIT OPERATING - WEST VIRGINIA)	(24,800,143)	(21,291,559)	(258,540)	(544,260)	0	FACTOR1	
289 KE:(TOTAL OTHER DEFERRED TAXES - STATE)							

EOP Reports

Sch 23

Gross FID		2020 Cost of Service (EOP) - DATA ENTRY & TEST ONLY	System
53	BOOK OP - GAIN (LOSS) SALE PROP		1,736,076
227	REG ASSET - PLANT ABANDONMENT		183,602,022

REG ASSET - PLANT ABANDONMENT

F80S	DFIT OPERATING	
290		
291		2,573,946
292		

State	OTHER DEFERRED STATE TAXES	
284		0
285	DSIT OPERATING - DC	
286	DSIT OPERATING - NORTH CAROLINA	(259,811)
287	DSIT OPERATING - VIRGINIA	(12,726,205)
288	DSIT OPERATING - WEST VIRGINIA	(272,958)
289	TOTAL OTHER DEFERRED TAXES - STATE	(12,259,027)

RATE BASE		
PLANT INVESTMENT		
ELECTRIC PLANT INCL. NUCLEAR FUEL		47,517,305,534
ACQUISITION ADJUSTMENTS		52,041,789
ELECTRIC C/WP INCL. FUEL		3,113,140,308
PLANT HELD FOR FUTURE USE		17,409,551
TOTAL PLANT INVESTMENT		50,689,897,180
DEDUCT:		
ACCUM. PROV. FOR DEPREC. & AMORT		(17,650,176,292)
AMORT OF NUCLEAR FUEL		(1,254,822,185)
ACQUISITION ADJ. FOR DEPREC. RESERVE		(43,547,670)
TOTAL DEPRECIATION & AMORTIZATION		(19,948,746,157)
NET PLANT		31,751,151,024
DEDUCT:		
ACCUMULATED DEFERRED INCOME TAXES		2,797,373,143
CUSTOMER DEPOSITS		113,789,769
EXCESS DEFERRED INCOME TAXES		2,516,152,137
ADD:		
WORKING CAPITAL		870,218,926
MATERIAL & SUPPLIES		(3,545,817,329)
CASH		(117,434,033)
DEFERRED FUEL		(2,783,062,441)
TOTAL ALLOWANCE FOR WORK CAPITAL		(2,783,062,441)
TOTAL RATE BASE		23,528,803,534



<<< **OTHER DEFERRED TAXES**
 this flows to "CUSTOMER DEPOSITS" ?

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Thirteenth Set

The following response to Question No. 265 of the Thirteenth Set of Interrogatories and Requests for Production of Documents Propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 2, 2021 has been prepared under my supervision.

Daniela H. Lee
Tax Advisor
Dominion Energy Services, Inc.

Paul M. McLeod
Manager – Regulation
Dominion Energy Services, Inc.

As it pertains to legal matters, the following response to Question No. 265 of the Thirteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 2, 2021 has been prepared under my supervision.

Jimmie Zhang
McGuireWoods LLP

Question No. 265

Impairments Related to Early Retirements. Refer to the response to Staff 2-54. As it relates to the March 31, 2020 journal entries related to the generating unit impairments for 2020 which totaled \$783,617,724 (\$687,099,642 – Chesterfield Units 5&6 + \$92,688,736 – Yorktown Unit 3 + \$3,829,345 – Chesterfield and Yorktown ARC), please provide the following information:

- a. What was the ADIT impact of the Company's 2020 generating units impairment in the 2020 earnings test rate base and how was this amount derived? Show detailed calculations.
- b. Pursuant to part "a", how and where was the ADIT related to the 2020 generating units impairment recorded in the 2020 earnings test? Show the total Company and Virginia jurisdictional ADIT amounts.

Response:

- a. See Attachment AG Set 13-264 (DHL)(PMM).
- b. The Company objects to this request because it requires original work. Notwithstanding and subject to this objection, the Company provides the following response:

21092033

See Filing Schedule 40(a) for the allocation factors applicable to each item identified in the Company's response to subpart (a) of this response.

Exhibit LA-9
Company Discovery Responses Regarding PJM Administrative Fees
(Responses to Staff 8-176 and Staff 18-370)

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Eighth Set

The following response to Question No. 176 of the Eighth Set of Interrogatories and Requests for Production of Documents Propounded by the Virginia State Corporation Commission Staff received on May 25, 2021 has been prepared under my supervision.

Norris Tyler
Director - Financial & Business Services
Dominion Energy Services, Inc.

Question No. 176

Please refer to RM Adjustment 8.

- (a) Please describe how the DOMLSE Allocation Factor of 84.3100% is derived.
- (b) Please provide a narrative for the determination of the 3% escalation factor used to calculate the 2022 Generation PJM Admin Fees - System of \$20,310,933.

Response:

- (a) The demand allocation factor is derived from a Network Service Peak Load (NSPL) allocation methodology. This demand allocation factor is based on the Virginia retail jurisdiction's contribution to DOMLSE's annual peak load for PJM's annual period ending October 31, 2020.
- (b) The 3% escalation factor was based on the 5-Year CAGR of actual Generation PJM Admin Fees for the period 2015 – 2020.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Eighteenth Set

The following response to Question No. 370 of the Eighteenth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 1, 2021 has been prepared under my supervision.

Norris E. Tyler
Director Financial & Business Services
Dominion Energy Services, Inc

Paul M. McLeod
Manager Regulation
Dominion Energy Services, Inc

Question No. 370

Please refer to Company adjustment RM-8. In developing the rate year level of PJM admin fees, please clarify why the Company utilized the transmission PJM admin fees of \$16,625,386 as the starting point instead of the test year generation PJM admin fees of \$15,803,801.

Response:

At the time when the 2022 Budget was developed during the fourth quarter of 2020, the \$16,625,386 was used as an estimate to develop the 2022 Generation PJM Admin Fees budget. The \$15,803,801 actual 2020 Generation PJM Admin Fees figure was not available until after the books closed for 2020 in early January 2021.

Exhibit LA-10

Company Discovery Responses Regarding Payroll Expense, Work Force Levels, and Vacancies

(Responses to OAG 12-258; OAG 16-271; OAG-16-272; Staff 9-212; Staff 9-213; Staff 9-215; Staff 21-447; Staff 21-448 (without confidential attachments); Staff 21-449 (without confidential attachment); and Staff 21-450)

Virginia Electric and Power Company

Case No. PUR-2021-00058

Office of the Attorney General

Division of Consumer Counsel

Twelfth Set

The following response to Question No. 258 (a)-(c) and (e)-(h) of the Twelfth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 26, 2021 has been prepared under my supervision.

Janet L. Mitchell
Regulatory Specialist
Dominion Energy Services, Inc.

The following response to Question No. 258 (d), (j), and (l) of the Twelfth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 26, 2021 has been prepared under my supervision.

James Wes Edwards, III
Manager - Finance
Dominion Energy Services, Inc.

As it pertains to legal matters, the following response to Question No. 258 of the Twelfth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 26, 2021 has been prepared under my supervision.

Jimmie Zhang
McGuireWoods LLP

Question No. 258 (a)-(h), (j), and (l)

Payroll Expense. Refer to the Direct Testimony of Company witness McLeod and Schedule 29(d), Adjustment No. RM-16 from VEPCO's supplemental filing. On page 19 of his testimony, Mr. McLeod stated that this adjustment reflects a return to full staffing levels at VEPCO and DES by 2022 (1) following uncertainties presented by the Covid-19 pandemic, and (2) to support the Company's build plans in conjunction with the Virginia Clean Economy Act (VCEA).

- a. In the context of the Company's proposed adjustment to increase staffing levels by: (1) 199 positions (70 – Nuclear, 53 – Fossil and Hydro, and 76 – Distribution) for VEPCO, and (2) 248 positions (79 - BU Managed DES and 169 – Other DES) for DES, show in detail by month from January 2021 through June 2021 all positions that have been filled in each category, and also show by month for July 2021 through December 2022 the Company's specific plans to fill positions that were not filled by June 30, 2021. Explain fully.

- b. In the context of the Company's proposed adjustment to increase staffing levels by: (1) 199 positions (70 – Nuclear, 53 – Fossil and Hydro, and 76 – Distribution) for VEPCO, and (2) 248 positions (79 - BU Managed DES and 169 – Other DES) for DES, how many the projected positions in each category relate to (1) the VCEA, and (2) the Covid-19 pandemic? Explain fully.
- c. Concerning the VCEA, how does VEPCO's proposed projected staffing increases, in each month, January 2021 through December 2022, relate to (1) labor costs (payroll, benefits, payroll taxes, etc. for which the Company is seeking recovery in base rates, and (2) to RAC based recovery? Identify, quantify, and explain the amounts.
- d. With regard to DES, what does the designation "BU Managed" mean?
- e. With regard to the proposed addition of 199 positions for VEPCO, has the Company filled any of these positions as of June 30, 2021? If so, provide a list by position and salary of those positions filled. If not, when does the Company anticipate filling these positions? Explain fully.
- f. For any of the 199 positions that have not been filled by June 30, 2021, show by month, the Company's current projections for July 2021 through December 2022 of when the positions are expected to be filled.
- g. With regard to the proposed addition of 248 positions, has the Company filled any of these positions as of June 30, 2021? If so, provide a list by position and salary of those positions filled. If not, when does the Company anticipate filling these positions? Explain fully.
- h. For any of the 248 DES positions that have not been filled by June 30, 2021, show by month, the Company's current projections for July 2021 through December 2022 of when the positions are expected to be filled.
- j. For DES, how were the 2020 average salaries of \$104,105 (BU Managed DES) and \$100,122 (Other DES) derived? Show detailed calculations.
- l. For DES, how was the benefits factor of 48.2% determined? Explain fully and show detailed calculations.

Response:

The Company objects to this request to the extent it requires original work. Notwithstanding and subject to this objection, the Company provides the following response:

- a. See the table below for comparable DEV and DES vacancies as of June 30, 2021 and a comparison to the vacancies presented in Adjustment RM-16:

	Vacancies as of 6/30/2021	Vacancies per RM-16	Change
DEV			
Nuclear	91	70	21
F&H	66	53	13
Distribution	23	76	(53)
DES			
BU Managed DES	34	79	(45)
Other DES	118	169	(51)

It is assumed for budgeting purposes that the remaining vacancies will be filled before or during 2022. The vacancy assumption is not prepared by month.

- b. See the Company's response to Staff Set 21-447 for an explanation of the Company's expectation for increased headcount as the requirements of the VCEA are developed and executed. With respect to COVID-19, the Company experienced delays in hiring during the test period because of the pandemic. At this time, the Company has not prepared specific analysis on headcount related to COVID-19. The Company's assumption for budgeting purposes is that hiring will resume and all vacancies will be filled before or during 2022.
- c. As noted in the Company's response to Staff Set 21-447, the Company has not prepared specific analysis on headcount related to the VCEA. See the workpapers for Ratemaking Adjustments RM-16 and RM-38 in Schedule 29(d) for the payroll, benefits, and payroll taxes associated with the full staffing assumption. All incremental increases to O&M expense are assumed to be non-rider.
- d. See the Company's response to Staff Set 9-215.
- e-h. See the response to part (a).
- j. See the Company's response to Staff Set 21-449.
- l. See Supplemental Filing Schedule 29 supporting documentation made available on eRoom. Specifically, the document D-2020RM – Wages-Benefits Full Staffing.

Virginia Electric and Power Company

Case No. PUR-2021-00058

Office of the Attorney General

Division of Consumer Counsel

Twelfth Set

As it pertains to fossil and hydro, the following response to Question No. 258 (i) and (k) of the Twelfth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 26, 2021 has been prepared under my supervision.

Paul T. Adams
Manager – Finance and Business Services
Dominion Energy Services, Inc.

As it pertains to nuclear, the following response to Question No. 258 (i) and (k) of the Twelfth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 26, 2021 has been prepared under my supervision.

Warren Chip Field
Manager - Finance & Business Services
Dominion Energy Services, Inc.

As it pertains to distribution, the following response to Question No. 258 (i) and (k) of the Twelfth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 26, 2021 has been prepared under my supervision.

Noah J. Jesse, III
Manager – Financial and Business Services
Dominion Energy Virginia

Question No. 258 (i) and (k)

Payroll Expense. Refer to the Direct Testimony of Company witness McLeod and Schedule 29(d), Adjustment No. RM-16 from VEPCO's supplemental filing. On page 19 of his testimony, Mr. McLeod stated that this adjustment reflects a return to full staffing levels at VEPCO and DES by 2022 (1) following uncertainties presented by the Covid-19 pandemic, and (2) to support the Company's build plans in conjunction with the Virginia Clean Economy Act (VCEA).

- i. For VEPCO, how were the average salaries of \$79,800 (Nuclear), \$86,000 (Fossil & Hydro) and \$83,177 (Distribution) derived? Show detailed calculations.
- k. For VEPCO, how were the benefits factors of 28.8% (Nuclear), 31.1% (Fossil & Hydro) and 36.4% (Distribution) determined? Explain fully and show detailed calculations.

Response:

- (i) As it pertains to F&H and nuclear. Please see the Company's response to Staff Set 9-212. As it pertains to distribution, please see Attachment AG Set 12-258 (NJJ).

- (k) As it pertains to F&H and nuclear. Please see the Company's response to Staff Set 9-212. As it pertains to distribution, please see Attachment AG Set 12-258 (NJJ).

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Employee Subgroup	FTE	Agg_Annual_Cost
Co-op/Intern-FT	0	\$0
Co-op/Intern-PT	0	\$0
Salaried Exempt	555	\$61,102,044
Non-Union PT>1000	8	\$452,946
Sal First Line/Mthly	141	\$15,137,460
Salaried Non-Exempt	601	\$42,063,171
IBEW FT	1155	\$85,859,028
Distribution_Summary	2460	\$204,614,649
Employee Subgroup		
Co-op/Intern-FT		\$0
Co-op/Intern-PT		\$0
Salaried Exempt		\$110,094
Non-Union PT>1000		\$56,618
Sal First Line/Mthly		\$107,358
Salaried Non-Exempt		\$69,989
IBEW FT		\$74,337
All		\$83,177

Dominion Energy Virginia
2021 Triennial Review
Distribution

	2020 YE	2022 Budget
Design	379	391
Planning	37	47
Reliability	77	79
Tree & Brush	22	24
New Technology	59	66
Underground Program	35	37
Distribution Operations	593	603
Operations Centers	148	149
Distribution Construction	929	956
Safety Training	59	62
Common	1	1
Customer Solutions	31	31
	<u>2,370</u>	<u>2,446</u>
Net Change		76
Total Salaries Paid 2022		204,614,649
Average Salary 2022		83,653
Budgeted Benefits/Pension 2022		\$51,315,488
Budgeted Employee Savings Plan 2022		\$8,387,531
Budgeted AIP 2022		\$14,746,444
Budgeted Other Benefits 2022		\$3,560
Total Benefits		\$74,453,023
Benefits Factor		36.4%

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Sixteenth Set

The following response to Question No. 271 of the Sixteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 16, 2021 has been prepared under my supervision.

Anthony D. Sofia
Manager – Human Resources
Dominion Energy Services, Inc.

Question No. 271

Payroll Expense. Refer to the response to Staff 21-445 and Schedule 29(d), Adjustment No. RM-16 from VEPCO's supplemental filing.

- a. What is VEPCO's headcount after reflecting the addition of the 199 positions (70+53+76) from Adjustment No. RM-16 for the 2022 Rate Year?
- b. Why did VEPCO's headcount decrease in each year from 2017 through 2020?
- c. What was VEPCO's actual headcount as of July 31, 2021?

Response:

- a. VEPCO's headcount reflecting the addition of 199 positions will be 6,169.
- b. Headcount decrease was primarily due to turnover, unfilled vacancies, reduction in staffing levels resulting from closing of the Yorktown power station, and the Voluntary Retirement Program.
- c. VEPCO's actual headcount as of July 31, 2021 is 6,016.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Sixteenth Set

The following response to Question No. 272 of the Sixteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 16, 2021 has been prepared under my supervision.

Anthony D. Sofia
Manager – Human Resources
Dominion Energy Services, Inc.

Question No. 272

Payroll Expense. Refer to the response to Staff 21-446 and Schedule 29(d), Adjustment No. RM-16 from VEPCO's supplemental filing.

- a. What is Dominion Energy Service's (DES) headcount after reflecting the addition of the 248 positions (79+169) from Adjustment No. RM-16 for the 2022 Rate Year?
- b. Why did DES's headcount fluctuate so much in each year from 2017 through 2020?
- c. What was DES's actual headcount as of July 31, 2021?

Response:

- a. DES's headcount reflecting the addition of 248 positions will be 3,058.
- b. Fluctuation was primarily due to the integration/addition of Questar employees (2018), reductions as result of the Voluntary Retirement Program (2019) and sale to Berkshire-Hathaway (2020).
- c. DES's actual headcount as of July 31, 2021 is 2,899. (excludes Co. 7000 SCNC headcount).

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Ninth Set

As it pertains to nuclear, the following response to Question No. 212 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on June 1, 2021 has been prepared under my supervision.

Chip Field
Manager, Finance & Business Services
Dominion Energy Services, Inc.

As it pertains to distribution, the following response to Question No. 212 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on June 1, 2021 has been prepared under my supervision.

Noah J. Jessee, III
Manager – Financial and Business Services
Dominion Energy Virginia

As it pertains to fossil and hydro, the following response to Question No. 212 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on June 1, 2021 has been prepared under my supervision.

Paul T. Adams
Manager – Finance and Business Services
Dominion Energy Services, Inc.

Question No. 212

Please refer to the excel file labeled "D-2020RM – Wages-Benefits Full Staffing" and the tab "Headcount – DEV." Please provide all supporting documentation for the following items:

- (a) Forecasted increase in headcount, by business area;
- (b) Average salary, by business area; and
- (c) Benefits factor, by business area.

Response:

Please see the below calculations as it pertains to the supporting documentation for nuclear (in thousands).

Nuclear-Virginia	Staffing	Staffing
	12/31/2020	Budgeted 2022
Fleet Ops Performance	326	330
Oversight	7	7
Engineering-excludes SLR adders	205	237
North Anna	500	523
Surry	494	533
	1,532	1,630
Excluded Capital SLR-Adders Included in Eng	-	(28)
	1,532	1,602
Net Change Staffing (212-A)		70
Budgeted Salaries 2022		\$ 165,018.00
Budgeted Salaries Capitalization 2022		\$ (34,916.00)
Salaries Net of Capital 2022		\$ 130,102.00
Average Salary (212-B)		\$ 79.817
Budgeted Salaries 2022		\$ 165,018.00
Budgeted Pension 2022		\$ 35,092
Budgeted OPEB 2022		\$ (16,932)
Budgeted Benefits Other 2022		\$ 29,293
Total Benefits 2022		\$ 47,454
Benefits as a Percentage of Total Salaries 2022 (212-C)		28.76%

Please see the table below for the requested information as it pertains to distribution.

<u>Department</u>	<u>2020 YE</u>	<u>2022 Budget</u>
Design	379	391
Planning	37	47
Reliability	77	79
Tree & Brush	22	24
New Technology	59	66
Underground Program	35	37
Distribution Operations	593	603
Operations Centers	148	149
Distribution Construction	929	956
Safety Training	59	62
Common	1	1
Customer Solutions	31	31
	2,370	2,446
Net Change		76
Total Salaries Paid 2022		204,614,649
Average Salary 2022		83,653
Budgeted Benefits/Pension 2022		\$51,315,488
Budgeted Employee Savings Plan 2022		\$8,387,531
Budgeted Other Benefits 2022		\$3,560
Total Benefits		\$59,706,579
Benefits Factor		29.2%

See the table below for the requested information as it pertains to F&H (in thousands).

Fossil & Hydro Staffing Detail

Description	12/31/20	12/31/22
Bath County	44	48
Bellemeade	0	0
Bremo	1	1
Small CTs	20	20
Chesterfield	146	155
Clover	76	100
Contracted Assets	3	3
Ladysmith / Remington	15	16
Mt. Storm	179	191
Possum Point	48	48
Roanoke Rapids / Gaston	16	17
Yorktown	28	30
Total	576	629
Net Staffing Change (212-A)		53
Total Salaries Paid 2022 (\$000s)		\$54,466
Average Salary 2022 (\$000s) (212-B)		\$87
Budgeted Benefits 2022		\$17,089
Benefits Factor (212-C)		31.4%

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Ninth Set

The following response to Question No. 213 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on June 1, 2021 has been prepared under my supervision.

Wes Edwards
Manager – DES Finance
Dominion Energy Services

Question No. 213

Please refer to the excel file labeled "D-2020RM – Wages-Benefits Full Staffing" and the tab "Headcount – DES." Please provide all supporting documentation for the following items:

- (a) No. of Vacancies;
- (b) Average Salary – 2020;
- (c) Benefits Factor; and
- (d) BU Managed DES Billing Percentage to DEV.

Response:

Please see Attachment Staff Set 9-213 (WE).

Prepared at the request of counsel and in connection with the Company's triennial review proceeding, SCC Case No. PUR-2021-00058
 Please refer to the excel file labeled "D-2020RM - Wages-Benefits Full Staffing" and the tab "Headcount - DES." Please provide all supporting documentation for the following items:

- (a) No. of Vacancies;
- (b) Average Salary - 2020;
- (c) Benefits Factor; and
- (d) BU Managed DES Billing Percentage to DEV.

213 (a) & (b)				
Group	Sum of Salaries (2020)	Sum of Vacancies	Map	Average Salary 2020
BU Managed DES	8,224,261	79	BU Managed DES	104,105
Corp Planning, Finance, Accounting & Risk	3,235,100	33	Other DES	98,033
IT & Security	5,492,250	54	Other DES	101,708
Supply Chain, Facilities & HR	3,578,986	41	Other DES	87,292
Corp Affairs, Law, Environmental, Exec, Nuc & Other1	4,614,218	41	Other DES	112,542
Grand Total	25,144,814	248		

(a) & (b)	(b) Avg Salary	(a) # Vacancies	Total Salary
BU Managed DES	104,105	79	8,224,261
Other DES	100,122	169	16,920,554
Total		248	25,144,814

213 (c)		(c)
Benefits Factor	LOADING FACTOR	48.2%

DES Benefit's Loading Factor

GL	2020 GL Description	2020
	5301010 Employee Benefits - Medical	26,102,679
	5301020 Employee Benefits - Dental / Vision	1,637,795
	5301030 Employee Benefits - Life Insurance	2,451,025
	5301040 Employee Benefits - Disability	2,319,639
	5301062 Employee Benefits - ME Pension Service	33,176,551
	5301064 Employee Benefits - ME OPEB Service Cos	4,391,352
	5301065 Employee Benefits - ME Pension NSC	(15,248,789)
	5301066 Employee Benefits - ME OPEB NSC	(24,980,274)
	5301090 Employee Benefit Plan Administration	2,075,533
	5301120 Executive Supplemental Compensation Pro	6,381,914
	5301130 Employee Benefits - Savings Plan	12,467,073
	5301990 Other Employee Benefits - Miscellaneous	473,703
	5302120 Transfer/Relocation Expense	2,164,072
	5302920 Tuition Reimbursement Expense	750,142
	5409261 CA-Emp Bfit-Medical	(29)
	5409262 CA-Emp Bfit-Other	(26)
	5409263 CA-Emp Bfit-OPEB	24
	5409264 CA-Emp Bfit-Pensions	(20)
	5409265 CA-Exec Supp Comp	-
	9926000 Admin & General - Employee Benefits	-
	5300150 Salaried - Vacation Accrual	2,044,334
	5300175 A&G Benefits - Long-term Incentive Plan	23,494,035
	5300180 Salaried - Annual Incentive	83,564,269
	5300250 Hourly - Vacation Accrual	1,192
	5300280 Hourly - Annual Incentive	86,113
Employee Benefits and Incentives		163,352,308
	5300110 Salaried - Straight-Time Wages	336,629,224
	5300210 Hourly - Straight-Time Wages	2,353,762
Salary		338,982,987

213 (d)				
BU Managed DES Billing % Support				
2020 BU Managed DES Actuals	\$ Billed to DEV	% Total	(d) - BU Managed DES	
DEV	15,791,006	72.6%	72.6%	
All other affiliates	5,954,136	27.4%		
Total	21,745,142			

Other DES Billing % Support

2022 DEV Billing %						(d) - Other DES	
Billing CC	Comp Code	O&M	EID	Headcount	Average		
DNNA	1000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
VPCORP	1000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
VPCUST	1000	0.61%	0.09%	0.11%	0.27%	0.11%	0.27%
VPD	1000	12.06%	22.80%	21.26%	18.71%	12.06%	18.71%
VPES	1000	0.88%	0.58%	0.74%	0.73%	0.88%	0.73%
VPET	1000	6.26%	4.20%	4.14%	4.87%	6.26%	4.87%
VPFOS	1000	15.51%	5.81%	7.07%	9.46%	15.51%	9.46%
VPNUC	1000	14.05%	10.34%	11.82%	12.07%	14.05%	12.07%
VPOG	1000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
VPTCAP	1000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Virginia Power Total		49.38%	43.82%	45.14%	46.11%		

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Ninth Set

The following response to Question No. 215 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on June 1, 2021 has been prepared under my supervision.

Wes Edwards
Manager – DES Finance
Dominion Energy Services, Inc.

Question No. 215

Please refer to the excel file labeled "D-2020RM – Wages-Benefits Full Staffing" and the tab "Headcount – DES." Provide a narrative explaining what "BU Managed DES" and "Other DES" are.

Response:

BU Managed DES is primarily representative of groups that organizationally report to business unit leadership within DEV. Other DES is comprised of all other groups, which organizationally do not report to business unit leadership within DEV.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Twenty-first Set

The following response to Question No. 447 of the Twenty-first Set of Interrogatories and Requests for Production of Documents Propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

Jeffrey Miscikowski
General Manager – Construction Project Controls
Dominion Energy Services, Inc.

Alan Bradshaw
Director – Electric Distribution Operations
Dominion Energy Virginia

As it pertains to legal matters, the following response to Question No. 447 of the Twenty-first Set of Interrogatories and Requests for Production of Documents Propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

Jimmie Zhang
McGuireWoods LLP

Question No. 447

How does the Company anticipate that the Virginia Clean Economy Act will impact headcount between now and the rate year? Please provide any supporting documentation. If applicable, please provide the response in Microsoft Excel format with formulas intact.

Response:

The Company objects to this request to the extent it requires original work. Notwithstanding and subject to this objection, the Company provides the following response:

The Company expects an increased headcount relative to the test period as the requirements of the VCEA are developed and executed. For example, the Project Construction group was created in September 2020 to manage major construction programs across Dominion Energy, Inc. including DEV. Most of these incremental full-time positions hired after formation of the group are supporting the solar and offshore wind construction programs per the requirements of the VCEA. An example with respect to the Power Delivery Group: The number of project applications in the PJM Queue for the DOM Zone has increased significantly over the last six to twelve months, many of which are related to the VCEA. This will likely increase staffing needs for the Transmission and Distribution teams. At this time, the Company has not prepared specific analysis on headcount related to the VCEA.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Twenty-First Set

As it pertains to nuclear, the following response to Question No. 448 of the Twenty-First Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

Warren Chip Field
Manager - Finance & Business Services
Dominion Energy Services, Inc.

As it pertains to distribution, the following response to Question No. 448 of the Twenty-First Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

Noah J. Jessee, III
Manager – Financial and Business Services
Dominion Energy Virginia

As it pertains to fossil and hydro, the following response to Question No. 448 of the Twenty-First Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

Paul T. Adams
Manager – Finance and Business Services
Dominion Energy Services, Inc.

Question No. 448

Please refer to Company adjustment RM-16, DEV portion of the adjustment. Please provide the job titles for the incremental employees, by business area. If applicable, please provide the response in Microsoft Excel format with formulas intact.

Response:

The information is not available by individual job title.

See Confidential Attachment Staff Set 21-448 (PTA) for F&H data, Confidential Attachment Staff Set 21-448 (WCF) for nuclear data, and Confidential Attachment Staff Set 21-448 (NJJ) for distribution data.

Confidential Attachments Staff Set 21-448 (PTA), (WCF), and (NJJ) contain confidential information in their entirety, and are being provided pursuant to the protections set forth in 5

21092033

VAC 5-20-170, the Hearing Examiner's Protective Ruling and Additional Protective Treatment for Extraordinarily Sensitive Information issued on April 21, 2021, the Hearing Examiner's Second Protective Ruling Providing Additional Protective Treatment for Extraordinarily Sensitive Information issued on April 30, 2021, any subsequent protective order or protective ruling issued in this proceeding, and the Agreements to Adhere executed pursuant to any such orders or rulings.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Twenty-first Set

The following response to Question No. 449 of the Twenty-first Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

James Wesley Edwards III
Manager – Finance and Business Services
Dominion Energy Services, Inc.

Question No. 449

Please refer to Company adjustment RM-16, DES portion of the adjustment and the Company's response to Staff interrogatory No. 9-213. Please provide the job titles for the incremental employees, by business area. If applicable, please provide the response in Microsoft Excel format with formulas intact.

Response:

Incremental employees are managed at the business area level, not by job title. Please see Confidential Attachment Staff Set 21-449 (JWE) for data by business area/group. Confidential Attachment Staff Set 21-449 (JWE) is confidential in its entirety, and is being provided pursuant to the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling and Additional Protective Treatment for Extraordinarily Sensitive Information issued on April 21, 2021, the Hearing Examiner's Second Protective Ruling Providing Additional Protective Treatment for Extraordinarily Sensitive Information issued on April 30, 2021, any subsequent protective order or protective ruling issued in this proceeding, and the Agreements to Adhere executed pursuant to any such orders or rulings.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Twenty-First Set

The following response to Question No. 450 of the Twenty-First Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

Carmen C. Anderson
HR Strategic Change & Project Manager
Dominion Energy Services, Inc.

As it pertains to legal matters, the following response to Question No. 450 of the Twenty-First Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on July 15, 2021 has been prepared under my supervision.

Jimmie Zhang
McGuireWoods LLP

Question No. 450

Please provide a list of vacant positions for union, non-union and service company, by month for calendar years 2017 through 2021 to-date.

Response:

The Company objects to this request because it requires significant original work. The Company does not systematically track vacancy information.

Exhibit LA-11
Company Discovery Responses Regarding Uncollectibles Expense
(Responses to OAG 14-267; Staff 1-16; Staff 7-161; and Staff 13-306
(without confidential attachment))

Virginia Electric and Power Company**Case No. PUR-2021-00058****Office of the Attorney General****Division of Consumer Counsel****Fourteenth Set**

The following response to Question No. 267 of the Fourteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 3, 2021 has been prepared under my supervision.

Paul M. McLeod
 Manager – Regulation
 Dominion Energy Services, Inc.

Question No. 267

Uncollectibles Expense. Refer to the Excel file titled “Supplemental Filing Schedules 19-28, 44 – 2022 Pro Forma Filing Worksheets – Supplemental” and the table below, which shows uncollectibles expense data from the tab titled “EOP Cap Str.”

Description	Virginia Jurisdictional Amount \$000's
FERC Account 904 - Uncollectible Accounts in 2020	\$ 135,947
Less: Total arrears forgiveness	\$ (117,072)
Plus: Company Claimed Recurring portion of arrears forgiveness	\$ 23,419
Net Uncollectibles Expense	\$ 42,294

- a. Is the \$42.294 million the amount of net uncollectibles expense the Virginia jurisdictional pro forma amount of uncollectibles expense that is included in VEPCO's proposed Rate Year ending December 31, 2022?
- b. If the answer to part “a” is anything other than an unqualified “yes”, provide the Rate Year Virginia jurisdictional pro forma amount of uncollectibles expense that VEPCO is seeking and show how it was derived. Show detailed calculations.

Response:

The \$42.294 million is the Virginia jurisdictional uncollectibles expense that is included in the Rate Year cost of service.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
First Set

The following response to Question No. 16 of the First Set of Interrogatories and Requests for Production of Documents Propounded by the Virginia State Corporation Commission Staff received on April 19, 2021 has been prepared under my supervision.

Ronnie T. Campbell
Supervisor - Accounting
Dominion Energy Services, Inc.

Question No. 16

Please provide in Excel with formulas intact DEV's write-offs, recoveries, net write-offs, and related billed revenues for each year 2017-2020, and the net charge-off percentage for uncollectibles for each year 2017-2020. Explain any material variations in the dollars and percentages between years.

Response:

See Attachment Staff Set 1-16 (RC) for the requested information. There were not any material variances during 2017 through 2020.

330026012

Month _____ (All)

Sum of Data Subcategory	Category	Year			
		2020	2019	2018	2017
Recovery	Collections Recoveries	\$ 4,496,393	\$ 4,456,578	\$ 5,290,414	\$ 5,099,702
	Non-Collections Recoveries	\$ 10,928,052	\$ 10,983,083	\$ 8,138,742	\$ 9,371,703
	Recoveries	\$ 15,424,446	\$ 15,439,661	\$ 13,429,155	\$ 14,471,405
C/O Subtotal	Gross C/O	\$ 35,805,138	\$ 38,453,924	\$ 36,888,591	\$ 37,005,352
	Net C/O	\$ 20,380,692	\$ 23,014,263	\$ 23,459,435	\$ 22,533,947
Revenue	Billed Revenue	\$ 7,015,878,667	\$ 7,554,711,629	\$ 7,605,383,815	\$ 7,003,189,828

22,347,084 \$ (5,471,916)

Net C/O Percentage of Billed Revenue
 2020 0.29% 2019 0.30% 2018 0.31% 2017 0.32%

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Seventh Set

The following response to Question No. 161 of the Seventh Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on May 19, 2021 has been prepared under my supervision.

Ben Blackmer
Accounting Specialist-Research
Dominion Energy Services, Inc.

Question No. 161

Please refer to the Company's response to Staff Interrogatory 4-98. Please describe and provide the numerator and denominator for each of the loss rate percentages. In addition, please provide the numerator and denominator for each year for 2009 through 2020. Please provide in Excel.

Response:

See Attachment Staff Set 7-161 (BB) for the requested information. This attachment describes and provides the numerator and denominator for each of the loss rate percentages for each year for 2009 through 2020 as well as illustrates the calculation of the loss rate percentages provided in response to Staff Interrogatory 4-98.

Amounts in Millions	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020 ***
Allowance for doubtful accounts (adjusted)*	\$ 15.6	\$ 9.7	\$ 11.4	\$ 11.7	\$ 13.3	\$ 14.2	\$ 11.2	\$ 6.9	\$ 7.6	\$ 8.0	\$ 8.1	\$ 20.1
Average Arrears**	\$ 111.5	\$ 95.5	\$ 101.0	\$ 94.7	\$ 98.5	\$ 97.9	\$ 92.5	\$ 83.9	\$ 83.5	\$ 90.6	\$ 96.1	\$ 149.1

14.02% 10.12% 11.24% 12.32% 13.53% 14.52% 12.09% 8.24% 9.10% 8.78% 8.47% 13.48%

2012-2014 simple average 13.5%
 2016-2019 simple average 8.65%

*Represents adjusted allowance for doubtful accounts based on the actual bad debt for the period (i.e. what should the allowance have been with the benefit of hindsight based on actual bad debt)
 **Represents average monthly arrears for the respective annual period (e.g. the average arrears balance for the 12 months of 2009 was ~\$111,500,000).
 ***Actuals balance as of 12/31/2020

Virginia Electric and Power Company
Case No. PUR-2021-00058
Virginia State Corporation Commission Staff
Thirteenth Set

The following response to Question No. 306 of the Thirteenth Set of Interrogatories and Requests for Production of Documents propounded by the Virginia State Corporation Commission Staff received on June 9, 2021 has been prepared under my supervision.

Ronnie T. Campbell
Supervisor - Accounting
Dominion Energy Services, Inc.

Question No. 306

Please provide VA SCC Jurisdictional Uncollectible expense (Account 904) in the most detail available by class or customer group type (e.g., Residential, Commercial and Industrial) for calendar year 2020.

Response:

The total system amount recorded to FERC Account 904 during 2020 was \$161.5M. This represents charge-offs of \$35.5M, recoveries of (\$14.8M), reserve adjustments of \$13.9M and customer account arrears forgiveness of \$126.9M pursuant to Virginia legislation enacted in November 2020. See Confidential Attachment Staff Set 13-306 (RC) for charge-offs by the residential and commercial customers. It is rare to incur charge-offs for the industrial customer class. Due to the timing of collections the recoveries are not available by customer class. In addition, the reserve adjustments are recorded at a high level. The VA SCC Jurisdictional amount is \$135.9M.

Confidential Attachment Staff Set 13-306 (RC) is confidential in its entirety and is being provided pursuant to the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling and Additional Protective Treatment for Extraordinarily Sensitive Information issued on April 21, 2021, the Hearing Examiner's Second Protective Ruling Providing Additional Protective Treatment for Extraordinarily Sensitive Information issued on April 30, 2021, any subsequent protective order or protective ruling issued in this proceeding, and the Agreements to Adhere executed pursuant to any such orders or rulings.

Exhibit LA-12

**Company Discovery Responses Regarding AMI Meters and Related
Costs**

**(Responses to OAG 2-52; OAG 6-172; OAG 6-173; OAG 9-219; OAG 9-
220; and OAG 16-273)**

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Second Set

The following response to Question No. 52 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Office of the Attorney General, Division of Consumer Counsel received on April 21, 2021 has been prepared under my supervision.

Josh Eager
Director – Financial and Business Services
Virginia Electric and Power Company

Derek Wenger
Electric T&D Strategic Advisor
Virginia Electric and Power Company

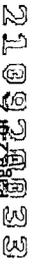
Question No. 52

Provide the total capital and O&M expenses associated with advanced metering infrastructure (“AMI”) and each other major component of VEPCO’s Grid Transformation Project for each year of the Triennial Review Period, and as forecasted in the Rate Year, and for each of the next five years.

Response:

See Attachment OAG Set 2-52 (JE-DW) for the requested information.

\$ in Millions	Actuals		Actuals		Actuals		Actuals		Actuals		Actuals		Actuals		Actuals		Actuals		Actuals		Actuals							
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2017	2018	2019	2020	2021	2022	2023	2024	2025	2017	2018	2019	2020	2021	2022	2023	2024	2025	
GTP AMI Cap	-	-	14.28	47.80	109.00	112.00	105.00	46.00	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GTP CIP Cap	-	-	-	33.00	49.60	73.50	41.40	2.60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GTP Telecommunications Cap	-	-	-	-	32.47	94.72	64.05	62.40	29.89	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GTP Grid Technologies Cap	-	-	-	-	18.16	39.52	33.49	40.30	40.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GTP Grid Hardening Cap	-	-	7.50	22.20	44.93	100.75	141.00	139.88	143.24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GTP Transportation Electrification Cap	-	-	-	-	2.38	1.40	0.35	1.05	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GTP Physical & Cyber	-	-	0.64	4.00	5.43	8.64	8.68	9.61	10.68	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



\$ in Millions	Actuals		Actuals		Actuals		9+3 BGT Plan		9+3 BGT Plan		9+3 BGT Plan		9+3 BGT Plan		9+3 BGT Plan	
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
GTP AMI Exp***	\$0.00	\$0.00	\$1.06	\$1.90	4.60	6.00	6.70	6.90	5.82							
GTP CIP Exp	\$0.00	\$0.00	\$3.02	\$2.30	10.80	25.40	41.70	16.10	13.85							
GTP Stakeholder Engagement & Customer Education Exp*	\$0.00	\$0.00	\$0.00	\$0.00	1.76	1.59	1.44	1.22	0.90							
GTP Telecommunications Exp**	\$0.00	\$0.00	\$0.68	\$0.00	0.32	3.88	5.38	6.20	8.75							
Grid Technologies Exp*	\$0.00	\$0.00	\$0.00	\$0.00	1.82	3.66	5.03	4.97	6.67							
GTP Hardening Exp*	\$0.00	\$0.00	\$0.10	(\$0.10)	6.32	8.27	8.36	4.09	2.08							
GTP Physical & Cyber Security Exp*	\$0.00	\$0.00	\$0.00	\$0.00	0.36	3.08	4.36	4.06	5.07							
GTP Transportation Electrification Exp*	\$0.00	\$0.00	\$0.00	\$0.00	10.89	3.40	2.95	3.34	1.67							

*Includes Credit to defer O&M for expected rider recovery

**Currently unapproved program, no credit to defer O&M at this time

***Does not include AMI system investments outside scope of the Grid Transformation AMI project

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Sixth Set

The following response to Question No. 172 part (a) of the Sixth Set of Interrogatories and Requests for Production of Documents Propounded by the Office of the Attorney General, Division of Consumer Counsel received on June 16, 2021 has been prepared under my supervision.

Timothy D. Patterson
McGuireWoods LLP

Paul M. McLeod
Manager – Regulation
Dominion Energy Services, Inc.

Question No. 172 a

AMI Meters. Refer to the response to OAG 2-52 and, specifically, Attachment OAG Set 2-52 (JE-DW) as it relates to capital spending.

- a. Are the capital amounts reflected in Attachment OAG Set 2-52 (JE-DW) Virginia jurisdictional amounts? If not, please identify the related Virginia jurisdictional amounts.

Response:

The Company objects to this request insofar as it requests that the Company provide Virginia jurisdictional amounts for rider-related balances and amounts after 2022 that are not part of this proceeding. Calculating this information would also require original work. Subject to and notwithstanding these objections, the Company provides the following response:

The capital spending amounts in Attachment OAG Set 2-52 (JE-DW) are system level costs. AMI and CIP plant in service balances are allocated to the VA jurisdiction using Factor 99 and Factor 24, respectively. See Schedule 15 within the Company's cost of service study in Schedule 40(a) for the allocation factors used in the 2019 and 2020 earnings tests. See Schedule 15 within the Company's cost of service study in Schedule 40(b) for the allocation factor used to develop the Company's pro forma cost of service for the rate year.

Virginia Electric and Power Company**Case No. PUR-2021-00058****Office of the Attorney General****Division of Consumer Counsel****Sixth Set**

The following response to Question No. 172 (parts b-e) of the Sixth Set of Interrogatories and Requests for Production of Documents Propounded by the Office of the Attorney General, Division of Consumer Counsel received on June 16, 2021 has been prepared under my supervision.

Daniela Lee
Tax Advisor
Dominion Energy Services, Inc.

Michael A Nwaokobia
Supervisor, Tax
Dominion Energy Services, Inc.

Noah J. Jessee, III
Manager – Financial and Business Services
Dominion Energy Virginia

Question No. 172 b-e

172. AMI Meters. Refer to the response to OAG 2-52 and, specifically, Attachment OAG Set 2-52 (JE-DW) as it relates to capital spending.

b. For each component of the capitalized AMI costs that totaled \$22.42 million in 2019, please provide the associated Virginia jurisdictional accumulated depreciation, ADIT, and property taxes for each year 2019 and 2020.

c. For each component of the capitalized AMI costs that totaled \$107.00 million in 2020, please provide the associated Virginia jurisdictional accumulated depreciation, ADIT, and property taxes for 2020.

d. For each component of the projected capitalized AMI costs totaling \$261.97 million in 2021, please provide the associated Virginia jurisdictional accumulated depreciation, ADIT, and property taxes for each year 2021 and 2022.

e. For each component of the projected capitalized AMI costs totaling \$430.53 million in Rate Year 2022, please provide the associated Virginia jurisdictional accumulated depreciation, ADIT, and property taxes for 2022.

Response:

(b)-(e) See Attachment AG Set 6-172(b-e) (DHL) (MAN) (NJJ) for the requested information. Please note that the capitalized AMI cost for 2019 is \$14.28 million, and for 2020 is \$47.8 million. The capitalized AMI cost is projected to be \$109.0 million for 2021 and \$112.0 million for 2022.

Virginia Power
Triennial Discovery Response

Staff Set 172 b-e

	2019	2020	2021	2022
ADIT	(196,171)	(378,766)	(622,137)	(914,479)
Property Tax		78,200	340,956	942,124
Accumulated Depreciation	(188,427)	2,631,379	12,723,109	32,522,893

One year lag for property taxes i.e. Tax Year 2020 Property Taxes based on asset at 12/31/2019 (Assessment Date 01/01/2020).

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Sixth Set

The following response to Question No. 173 of the Sixth Set of Interrogatories and Requests for Production of Documents Propounded by the Office of the Attorney General, Division of Consumer Counsel received on June 16, 2021 has been prepared under my supervision.

Timothy D. Patterson
McGuireWoods LLP

Paul McLeod
Manager – Regulation
Dominion Energy Services, Inc.

Noah J. Jessee, III
Manager – Financial and Business Services
Dominion Energy Virginia

Question No. 173

AMI Meters. Refer to the response to OAG 2-52 and, specifically, Attachment OAG Set 2-52 (JE-DW) as it relates to O&M expense.

- a. Are the O&M amounts reflected in Attachment OAG Set 2-52 (JE-DW) Virginia jurisdictional amounts? If not, please identify the related Virginia jurisdictional amounts.
- b. For each component of AMI-related O&M expense in each year 2019 through 2022, please state O&M expenses by FERC account.
- c. For each component of AMI-related O&M expense with the footnote “Includes Credit to defer O&M for expected rider recovery,” (1) please explain what this footnote means, and (2) state the amount of the credits that are embedded in the O&M expense amounts shown in each year, 2019 through 2022.
- d. For the component of AMI-related O&M expense referred to as “GTP Telecommunications Exp,” which has the footnote “Currently unapproved program, no credit to defer O&M at this time,” (1) please explain what this footnote means, and (2) explain why O&M expense amounts of \$0.68 million, \$0.32 million and \$3.88 million are reflected for 2019, 2021 and 2022, respectively.
- e. For the component of AMI-related O&M expense referred to as “GTP AMI Exp,” which has the footnote “Does not include AMI system investments outside scope of the Grid Transformation AMI project,” please explain what this footnote means.

f. Does VEPCO have AMI-related O&M expense that is beyond its Grid Transformation AMI project? If so, identify all such AMI O&M costs by account in each year, 2017-2020, and as projected for 2021 and 2022.

Response:

a. The Company objects to this request insofar as it requests that the Company provide Virginia jurisdictional amounts for rider-related balances and amounts after 2022 that are not part of this proceeding. Calculating this information would also require original work. Subject to and notwithstanding these objections, the Company provides the following response:

The AMI and CIP expense amounts in Attachment OAG Set 2-52 (JE-DW) are system level costs. See the response to part (b) for the FERC accounts in which the AMI-related expenses were recorded. FERC accounts 408.1, 588, and 926 are allocated to the Virginia jurisdiction using allocation factors "SAL_WAGES_XNA_XPM," "Factor D_XPM," and "SAL_WAGES_XNA_XPM," respectively. See Schedule 15 within the Company's cost of service study in Schedule 40(a) for the allocation factors used in the 2019 and 2020 earnings tests. See Schedule 15 within the Company's cost of service study in Schedule 40(b) for the allocation factor used to develop the Company's pro forma cost of service for the rate year.

All CIP-related O&M expenses were recorded to FERC account 588, which is allocated to the Virginia jurisdiction based on "Factor D_XPM." See Schedule 15 within the Company's cost of service study in Schedule 40(a) for the allocation factors used in the 2019 and 2020 earnings tests. See Schedule 15 within the Company's cost of service study in Schedule 40(b) for the allocation factor used to develop the Company's pro forma cost of service for the rate year.

b. See the table below for the requested AMI related O&M expense by FERC account for 2019 and 2020. The Company does not budget by FERC account.

Regulatory Account	Reg Acct Desc	2019	2020
9408100	Oth Tax-Util Op Inc	\$2,945	\$13,349
9588000	Dist Op-Misc Exp	\$1,044,373	\$1,843,443
9926000	Adm & Gen-Emp Bnfts	\$13,082	\$39,396
Grand Total		\$1,060,400	\$1,896,189

c. The referenced footnote does not apply to the AMI related O&M expense component.

d. The referenced footnote does not apply to the AMI related O&M expense component. All rider-related Grid Transformation Plan expenses are excluded from the Company's base rate cost of service in this proceeding.

e. The referenced footnote does not apply to the O&M expense item "GTP AMI Exp".

f. The Company does have AMI related O&M expenses that is beyond the GTP AMI Expense project. See the table below for the requested information. The Company does not budget specifically for these expenses.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Ninth Set

The following response to Question No. 219 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 13, 2021 has been prepared under my supervision.

Kimberly Dierkes
Supervisor Fixed Assets
Dominion Energy Services, Inc.

Noah J. Jessee, III
Manager – Financial and Business Services
Dominion Energy Virginia

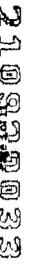
Question No. 219

AMI Meters. Refer to the response to OAG 6-172 and, specifically, Attachment AG Set 6-172(b-e) (DHL) (MAN) (NJJ).

- a. Why does accumulated depreciation change from a negative amount of \$188,427 in 2019 to a positive amount of \$2,631,379 in 2020? Explain fully.
- b. Please show how the accumulated depreciation amounts of (\$188,427), \$2,631,379, \$12,723,109 and \$32,522,893 in 2019, 2020, 2021 and 2022, respectively, were derived. Show detailed calculations.

Response:

- a. At the end of 2019, the cumulative cost of removal exceeded cumulative depreciation expense resulting in negative accumulated depreciation. By the end of 2020, cumulative depreciation expense exceeded cumulative cost of removal, resulting in positive accumulated depreciation. Refer to Attachment AG Set 9-219(b) for details.
- b. See Attachment AG Set 9-219(b) (KD)(NJJ) for the requested information.



2021 Total

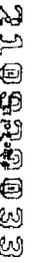
	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	2021 Total
GTP - AMI GTP_AMI_CAPITAL													
GTP AMI Capital Caseload													
GTP AMI Deployment													
GTP AMI General Capital													
GTP AMI License Fee													
GTP AMI Richmond District													
GTP AMI Deployment Charlestown District													
GTP AMI Deployment Charlestown District													
GTP AMI AP Replacement													
GTP AMI Deployment Herndon Distr													
GTP AMI North District													
GTP AMI Out Out Capital													
GTP AMI International Mailings													
GTP AMI Petersburg District													
GTP AMI Farmville District													
GTP AMI Deployment Central Region													
GTP AMI Southside District													
GTP AMI Deployment Woodbridge District													
GTP AMI East Richmond District													
GTP AMI South Boston District													
GTP_AMI_CAPITAL Total Monthly Charges	\$8,763,173	\$9,089,301	\$8,879,713	\$9,167,934	\$9,057,476	\$9,729,596	\$10,350,089	\$9,462,163	\$10,682,452	\$8,901,063	\$7,846,414	\$7,170,764	\$109,000,148
Cost of Removal Monthly Charges	375,117	38,907,79	38,010,67	39,244,39	38,771,56	41,648,65	43,876,68	40,503,87	45,777,46	38,102,02	33,587,48	30,695,28	466,587,62
CMIP Cumulative	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360
COR Cumulative	\$90,091,887	628,999,66	667,010,33	706,254,72	745,026,28	786,674,93	830,551,61	871,055,48	916,782,94	954,884,96	984,772,44	1,019,167,72	
PIS	\$48,982,867	\$78,033,260	\$86,874,972	\$96,003,661	\$105,072,366	\$114,710,313	\$124,316,516	\$134,338,185	\$144,974,910	\$153,837,871	\$161,650,697	\$168,790,766	
Depr Expense	\$506,449	\$572,894	\$637,807	\$704,817	\$771,039	\$842,165	\$917,095	\$986,266	\$1,064,357	\$1,129,426	\$1,186,786	\$1,239,206	
Accumulated Depreciation	3,100,316.47	3,634,302.86	4,234,099.28	4,899,681.77	5,631,949.41	6,432,465.64	7,305,684.46	8,251,446.77	9,270,076.77	10,361,401.12	11,516,599.17	12,733,108.43	

AMI

2022 Total
 Jan 22 Feb 22 Mar 22 Apr 22 May 22 Jun 22 Jul 22 Aug 22 Sep 22 Oct 22 Nov 22 Dec 22

- GTP AMI Capital Consulting
- GTP AMI Deployment
- GTP AMI General Capital
- GTP AMI License Fee
- GTP AMI Richmond District
- GTP AMI Deployment - Characteristics Data
- GTP AMI Woodbridge District
- GTP AMI AP Replacement
- GTP AMI Deployment - Herndon Distr
- GTP AMI Norfolk District
- GTP AMI Opt Out Capital
- GTP AMI International Mailings
- GTP AMI Petersburg District
- GTP AMI Farmville District
- GTP AMI Deployment - Central Region
- GTP AMI Southside District
- GTP AMI Deployment - Woodbridge District
- GTP AMI East Richmond District
- GTP AMI South Boston District

	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22	Jul 22	Aug 22	Sep 22	Oct 22	Nov 22	Dec 22	2022 Total
GTP_AMI_CAPITAL Total Monthly Charges	\$9,360,664	\$9,361,713	\$9,145,688	\$9,119,937	\$9,328,909	\$10,021,098	\$10,181,473	\$10,067,521	\$11,002,418	\$9,167,795	\$6,081,842	\$7,161,287	\$112,000,335
Cost of Removal Monthly Charges	40,069.40	40,073.89	39,149.17	39,038.89	39,933.47	42,896.46	43,587.96	43,095.18	47,097.11	39,243.80	34,595.15	30,654.71	479,430.29
CWIP Cumulative	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360	\$1,298,360
COR Cumulative	1,059,237.12	1,099,311.01	1,138,460.18	1,177,499.07	1,217,432.54	1,260,329.00	1,303,211.96	1,347,007.14	1,394,104.25	1,433,344.05	1,467,943.30	1,498,598.01	1,498,598.01
PTS	\$178,111,360	\$187,432,999	\$196,539,538	\$205,650,427	\$214,909,402	\$224,887,404	\$235,025,493	\$245,049,919	\$256,005,240	\$265,133,791	\$273,181,038	\$280,311,671	\$280,311,671
Depr Expense	\$1,307,634	\$1,376,071	\$1,442,928	\$1,509,197	\$1,577,793	\$1,651,050	\$1,725,479	\$1,799,075	\$1,879,505	\$1,946,524	\$2,005,604	\$2,057,955	\$2,057,955
Accumulated Depreciation	13,990,674.27	15,318,670.98	16,730,449.58	18,201,007.33	19,718,867.05	21,347,020.42	23,018,316.29	24,784,895.83	26,617,303.96	28,520,584.08	30,495,592.95	32,522,893.08	32,522,893.08



Partner Object Source Object Source object name

Cost element descr.

Cost element name

Object CO Object Cost Elem.

Project definition

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Project details Object

WBS element

Order

Description

CO Object Name

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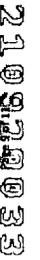
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Name of offsetting account	Name of offsetting account	Name of Person Resp.	Object Type	PTY	Partner Object Type	ParOrder	Partner project	Partner WBS element	Per	Purchase Order Text	Purch.Doc.	Source object type	User Name	VT	Order	Perq Data
AFUDC - Debt	Allowance for Funds Used Construction-Debt		WBS element						006				VA21000	PWRBATCH	4	43846
AFUDC - Debt	Allowance for Funds Used Construction-Debt		WBS element						006				VA21000	PWRBATCH	4	43846
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						007				VA21000	PWRBATCH	4	43877
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						007				VA21000	PWRBATCH	4	43877
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						008				VA21000	PWRBATCH	4	43708
Capitalized Interest	Capitalized Interest		WBS element						008				VA21000	PWRBATCH	4	43708
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						009				VA21000	PWRBATCH	4	43738
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						009				VA21000	PWRBATCH	4	43738
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						010				VA21000	PWRBATCH	4	43769
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						010				VA21000	PWRBATCH	4	43769
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						011				VA21000	PWRBATCH	4	43799
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						011				VA21000	PWRBATCH	4	43799
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						012				VA21000	PWRBATCH	4	43830
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						012				VA21000	PWRBATCH	4	43830
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						001				VA21000	PWRBATCH	4	43861
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						001				VA21000	PWRBATCH	4	43861
AFUDC - Debt	Allowance for Funds Used Construction-Debt		WBS element						002				VA21000	PWRBATCH	4	43890
AFUDC - Debt	Allowance for Funds Used Construction-Debt		WBS element						002				VA21000	PWRBATCH	4	43890
AFUDC - Debt	Allowance for Funds Used Construction-Debt		WBS element						003				VA21000	PWRBATCH	4	43921
AFUDC - Debt	Allowance for Funds Used Construction-Debt		WBS element						003				VA21000	PWRBATCH	4	43921
AFUDC - Debt	Allowance for Funds Used Construction-Debt		WBS element						003				VA21000	PWRBATCH	4	43921
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						004				VA21000	PWRBATCH	4	43951
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						004				VA21000	PWRBATCH	4	43951
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						004				VA21000	PWRBATCH	4	43982
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						004				VA21000	PWRBATCH	4	43982
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						005				VA21000	PWRBATCH	4	43982
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						005				VA21000	PWRBATCH	4	43982
Capitalized Interest	Capitalized Interest		WBS element						006				VA21000	PWRBATCH	4	44012
Capitalized Interest	Capitalized Interest		WBS element						006				VA21000	PWRBATCH	4	44012
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						007				VA21000	PWRBATCH	4	44043
AFUDC-Equity	Allowance Funds Used During Construction-Equity		WBS element						007				VA21000	PWRBATCH	4	44043
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						007				VA21000	PWRBATCH	4	44043
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						007				VA21000	PWRBATCH	4	44043
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						008				VA21000	PWRBATCH	4	44074
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						008				VA21000	PWRBATCH	4	44074
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						003				VA21000	PWRBATCH	4	44104
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						003				VA21000	PWRBATCH	4	44104
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						009				VA21000	PWRBATCH	4	44104
PowerPlan Posting Clearing	PowerPlan Posting Clearing		WBS element						009				VA21000	PWRBATCH	4	44104

Source object name	Peri. No.	Name of employee or app. Material	Met. Vendor	Vendor No CoCd	BusA	Item Created By	User Name	Name of Person Resp.	Respons.	Per Line	Pur	Purchase Doc Typ
	00000000			1000	1300	300 ROELS62	PWRBATCH	00000000	PP Line	1224		F
	00000000			1000	1300	300 ROELS62	PWRBATCH	00000000	PP Line	1261		F
	00000000			1000	1300	300 ROELS62	PWRBATCH	00000000	PP Line	1362		F
	00000000			1000	1300	300 TRAV991	PWRBATCH	00000000	PP Line	1224		F
	00000000			1000	1300	300 TRAV991	PWRBATCH	00000000	PP Line	1261		F
	00000000			1000	1300	300 TRAV991	PWRBATCH	00000000	PP Line	1362		F

Virginia Electric and Power Company**Case No. PUR-2021-00058****Office of the Attorney General****Division of Consumer Counsel****Ninth Set**

The following response to Question No. 220 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on July 13, 2021 has been prepared under my supervision.

Paul M. McLeod
Manager – Regulation
Dominion Energy Services, Inc.

Question No. 220

AMI-Related Expenses. Refer to the response to OAG 6-173. Part “a” to this response states that the Virginia jurisdiction allocation factor for FERC accounts 408.1 and 926 is identified as “SAL_WAGES_XNA_XPM” and that this allocation factor can be found on Schedule 15 within the Company’s cost of service study in Schedule 40(a). However, upon reviewing Schedule 15 from VEPCO’s revised filing, the allocation factor listed above (and provided in response to OAG 6-173) was not included, or is listed under a different name.

- a. Please explain and reconcile this discrepancy.
- b. Identify the Virginia jurisdictional factor(s) for each period for FERC accounts 408.1 and 926.

Response:

Allocation factor “SAL_WAGES_XNA_XPM” is listed as “Salaries & Wages Excluding North Anna & Excluding Private Military” in Schedule 15 within cost of service study Schedule 40(a).

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Sixteenth Set

The following response to Question No. 273 (a) – (c) of the Sixteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 16, 2021 has been prepared under my supervision.

Noah J. Jesse, III
Manager – Financial and Business Services
Dominion Energy Virginia

Kimberly Dierkes
Supervisor Fixed Assets
Dominion Energy Services, Inc.

Daniela Lee
Tax Advisor
Dominion Energy Services, Inc.

Janet L. Mitchell
Regulatory Specialist
Dominion Energy Services, Inc.

As it pertains to legal matters, the following response to Question No. 273 (a) – (c) of the Sixteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 16, 2021 has been prepared under my supervision.

Jimmie Zhang
McGuireWoods LLP

Question No. 273 (a)-(c)

Refer to the responses to OAG 6-172, OAG 9-218, OAG 9-219, and OAG 14-269 as well as the table below (the amounts of which are from OAG 6-172b-e). The amounts in the table below for AMI-related ADIT, Property Taxes and Accumulated Depreciation were provided in response to OAG 6-172, which had requested the Virginia jurisdictional amounts for these items for the years listed in the table. In addition, OAG 9-218 requested the Virginia jurisdictional depreciation expense amounts related to AMI in each year 2019 through 2022. However, the response to OAG 9-218 indicates that the AMI-related depreciation expense calculations (provided in response to OAG 9-219) are total system amounts.

Description	2019	2020	2021	2022
ADIT	\$ (196,171)	\$ (378,766)	\$ (622,137)	\$ (914,479)
Property Tax		\$ 78,200	\$ 340,956	\$ 942,124
Accumulated Depreciation	\$ (188,427)	\$ 2,631,379	\$ 12,723,109	\$ 32,522,893

a. Based on what was requested in OAG 6-172(b-e), are the amounts shown in the table above total system or Virginia jurisdictional amounts? If not the latter, provide the relevant Virginia jurisdictional factors (from Schedule 15 within CCOS Schedules 40(a) and 40(b)) to be applied to AMI-related ADIT, Property Taxes and Accumulated Depreciation.

b. Pursuant to part "a", please clarify whether the amounts shown on Attachment AG Set 9-219(b)(KD)(NJJ) are total system or Virginia jurisdictional amounts.

c. Refer to the response to OAG 14-269c, which states that the amounts shown on row 31 from Attachment AG Set 9-219(b)(KD)(NJJ), represent AMI project costs recorded to FERC 101 and related depreciation. Are the amounts shown on row 31 for AMI-related plant-in-service included in (1) VEPCO's earning test average rate base for 2019 and 2020, and (2) VEPCO's year-end rate base for prospective ratemaking (Rate Year 2022)? If not, explain fully why not and indicate which AMI-related amounts are included in earnings test rate year rate base.

Response:

The Company objects to this request to the extent it requires original work. Notwithstanding and subject to this objection, the Company provides the following response:

- a. The amounts shown in the table above are total system. ADIT, Property Tax, and Accumulated Depreciation associated with AMI are allocated to the Virginia jurisdiction using the following allocation factors respectively: "TOTAL_DIST_PLANT", "TOTAL_DIST_XRIDERU", and "Plant_Acct_370_EXC_AMR". See Schedule 15 within the Company's cost of service study in Schedule 40(a) for the allocation factors used in the 2019 and 2020 earnings tests. See Schedule 15 within the Company's cost of service study in Schedule 40(b) for the allocation factors used to develop the Company's pro forma cost of service for the rate year.
- b. The amounts shown on Attachment AG Set 9-219(b)(KD)(NJJ) are total system.
- c. Yes, the amounts shown on row 31 for AMI-related plant-in-service are included in (1) VEPCO's earning test average rate base for 2019 and 2020. The AMI-related plant additions for 2021 and 2022 are included in the rate base calculation for prospective ratemaking. See Adjustment RM-44 ("S-2020RM – Plant in Service" file) in the eRoom for how additions are accumulated and included in rate base.

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Sixteenth Set

The following response to Question No. 273 (d) of the Sixteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 16, 2021 has been prepared under my supervision.

Kimberly Dierkes
Supervisor Fixed Assets
Dominion Energy Services, Inc.

Question No. 273 (d)

AMI Costs. Refer to the responses to OAG 6-172, OAG 9-218, OAG 9-219, and OAG 14-269 as well as the table below (the amounts of which are from OAG 6-172b-e). The amounts in the table below for AMI-related ADIT, Property Taxes and Accumulated Depreciation were provided in response to OAG 6-172, which had requested the Virginia jurisdictional amounts for these items for the years listed in the table. In addition, OAG 9-218 requested the Virginia jurisdictional depreciation expense amounts related to AMI in each year 2019 through 2022. However, the response to OAG 9-218 indicates that the AMI-related depreciation expense calculations (provided in response to OAG 9-219) are total system amounts.

Description	2019	2020	2021	2022
ADIT	\$(196,171)	\$ (378,766)	\$ (622,137)	\$ (914,479)
Property Tax		\$ 78,200	\$ 340,956	\$ 942,124
Accumulated Depreciation	\$(188,427)	\$ 2,631,379	\$ 12,723,109	\$ 32,522,893

d. Referring to Attachment AG Set 9-219(b)(KD)(NJJ), and specifically Excel cells AB-31 and AB-33, which reflect December 31, 2020 plant-in-service (PIS) of \$60,257,205 and depreciation expense of \$829,620, respectively. Please explain fully and in detail why these amounts include the PIS amount of \$7,710,298 and depreciation expense amount of \$387,231 (pulled from the FERC Summary tab).

Response:

A manual journal entry was recorded in December 2020 for the portion of costs associated with the AMI project that should have been in service and depreciating but rather was still recorded to CWIP. The entry moved the identified costs from CWIP to PIS and recorded a depreciation expense true-up. A copy of the journal entry is included in the FERC Summary tab.

Exhibit LA-13
Company Discovery Responses Regarding Employee Benefits Expense
Error Correction
(Response to OAG 14-268)

Virginia Electric and Power Company
Case No. PUR-2021-00058
Office of the Attorney General
Division of Consumer Counsel
Fourteenth Set

The following response to Question No. 268 of the Fourteenth Set of Interrogatories and Requests for Production of Documents propounded by the Office of the Attorney General, Division of Consumer Counsel received on August 3, 2021 has been prepared under my supervision.

Paul M. McLeod
Manager – Regulation
Dominion Energy Services, Inc.

Question No. 268

Employee Benefits Expense. Refer to Schedule 29(d), Adjustment No. RM-14 and the response to Staff 12-469. As it relates to Adjustment No. RM-14 and specifically the Distribution System Benefits Rate Year costs of \$70,933,037, the response to Staff 22-469(b) states: “In researching this request, it was discovered that some employee benefits expenses are recovered through the A5 demand-side management riders. The amount budgeted for 2022 is estimated to be approximately \$360,000. There are no distribution benefits expenses recovered through the A6 riders.”

a. Based on the foregoing response to Staff 22-469(b), please confirm that the \$360,000 of estimated benefits expenses for 2022 was included in the Company’s proposed \$70,933,037 of Rate Year expense, when it should have been included in the A5 demand-side management riders, and therefore needs to be removed from the amount Virginia jurisdictional Rate Year benefits expense. If not confirmed, explain fully.

Response:

The \$360,000 of estimated A5 rider benefits expenses for 2022 was inadvertently included in the Company’s proposed \$70,933,037 of Rate Year expense and should be removed in determining the employee benefits for the base rate cost of service.